

**Using Geographic Information System to
Designate Campsites in the Nellie Juan-
College Fjord Wilderness Study Area
In Order to Protect Cultural Resource Sites**

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Clemson Class of 1993

June 1994

This paper was prepared as a student project in partial fulfillment of the requirements of the Professional Development for Outdoor Recreation Management Program at Clemson University. It in no way reflects USDA Forest Service policy nor are the opinions expressed those of anyone other than the author.

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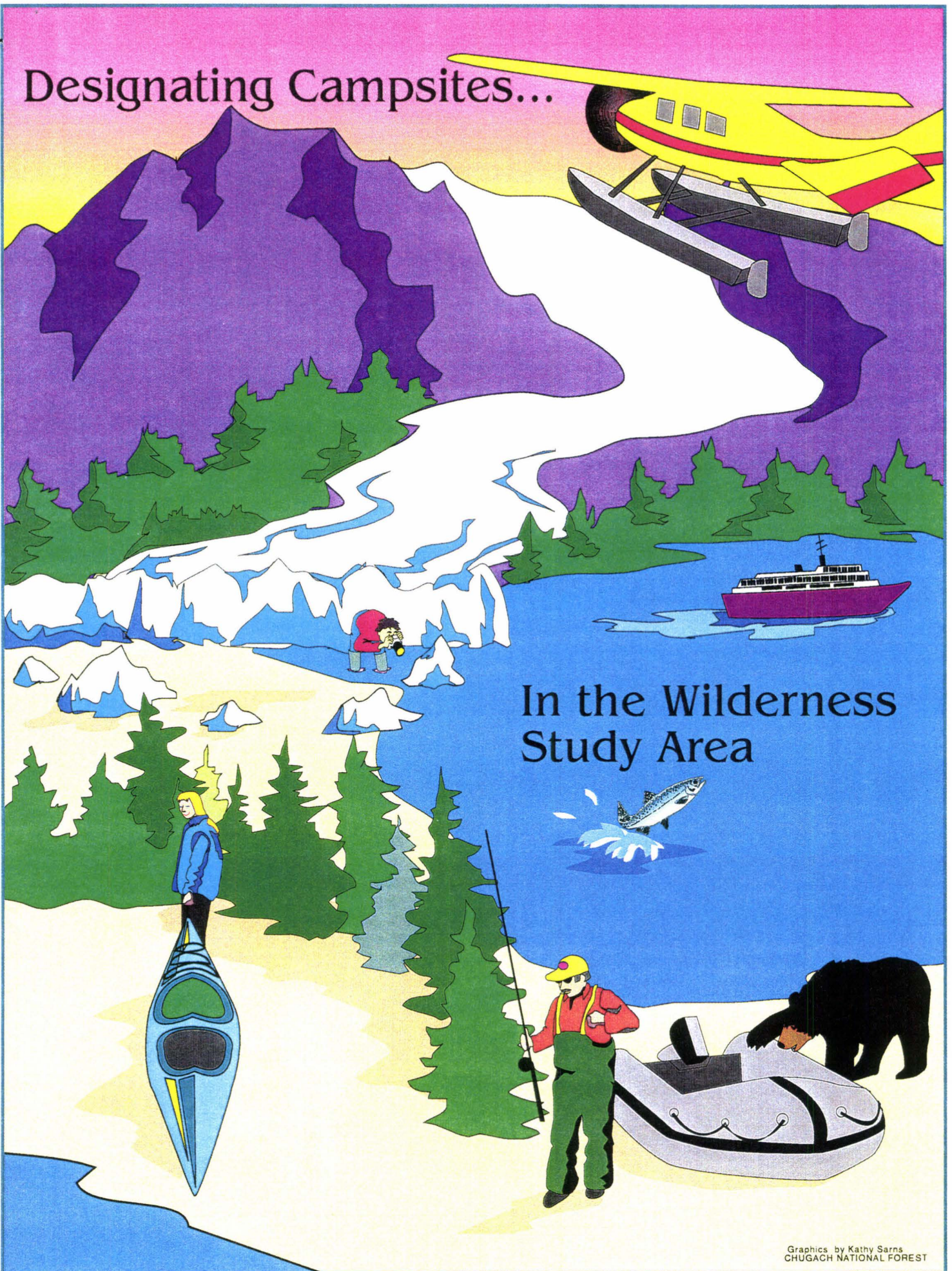
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Designating Campsites...



In the Wilderness Study Area

ABSTRACT

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TITLE: Using Geographic Information System to Designate Campsites in the Nellie Juan-College Fjord Wilderness Study Area in Order to Protect Cultural Resource Sites

ABSTRACT: The Chugach National Forest Land and Resource Management Plan recommended the Nellie Juan-College Fjord Wilderness Study Area (WSA) to be managed as wilderness and managed to maintain the wilderness character of the area. The U.S.D.A. Forest Service has the legal mandate to preserve cultural/historical resources. The Nellie Juan-College Fjord recommended wilderness area is rich in cultural resources. Public use of the WSA is increasing, and there is a potential for disturbance to cultural resource sites. In order to better follow the direction provided in the Forest Plan, it is recommended that the Glacier Ranger District begin the process of designating campsites in the WSA for outfitter-guide use. The intent of this paper is to identify a process for effectively designating campsites in the WSA so that cultural resource sites can be protected.

Keywords: Archeology, Campsite Inventory, Cultural Resource Management, Dispersed Camping, GIS, Historic Site, Outfitters, Permit/Outfitter-Guide, Tourism, User Needs, Wilderness

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EXECUTIVE SUMMARY

Title: **Designating Campsites in the Nellie Juan-College
Fjord Wilderness Study Area for Outfitter-Guides**

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Summary:

The project intent is to protect archeological sites located in the Nellie Juan-College Fjord Wilderness Study Area, Prince William Sound, Alaska while providing camping areas for outfitted/guided groups. Many of the beaches utilized in the past were located too close to archeological sites. Currently, there are 292 archeological sites on the coastline of western Prince William Sound in Glacier Ranger District. Within that area, approximately 130 campsites are available to outfitter/guides with an average group size of 10 clients.

I approached the problem by first researching the 292 archeological sites. The State Historic Preservation Officer (SHPO) provided information to the Chugach National Forest Geographic Information System (GIS). All sites were mapped on a 1:150,000 scale GIS map. I met with National Outdoor Leadership School (NOLS) instructors who have 20 years of experience sea kayaking in Prince William Sound. Those instructors plotted campsites (on quad maps) that had been used in the past. The quad maps were shown to several Forest Service employees who have lived and worked in Prince William Sound, and additional campsites were added. Criteria for a good campsite (set by NOLS) is a beach above high tide line with varying sizes of gray-wacky rock; sand beaches are uncommon in Prince William Sound. The archeological site GIS layer was overlaid with the campsite layer. After consulting with SHPO, Bureau of Indian Affairs (BIA), Chugach Alaska Corporation Archeologist and the Forest Service Archeologist, recommendations were made to the Glacier District Ranger. Final decisions about campsite locations were made by the District Ranger, and the campsite GIS layer was modified to show appropriate campsites that do not conflict with archeological sites.

Results included the following:

- Altering of Special Use Permits issued to outfitter-guides to show which campsites to use rather than where not to camp.
- A large scale (usable) map showing land ownership and appropriate campsites (maps are made a part of the Special Use Permit).
- Education, including Leave No Trace principles, and safety messages included with the map.
- Every campsite will be surveyed and cataloged. Data obtained to become a part of the forest planning process for future designation of campsites to include public and outfitter-guide use.

My recommendations, based on research results included the following:

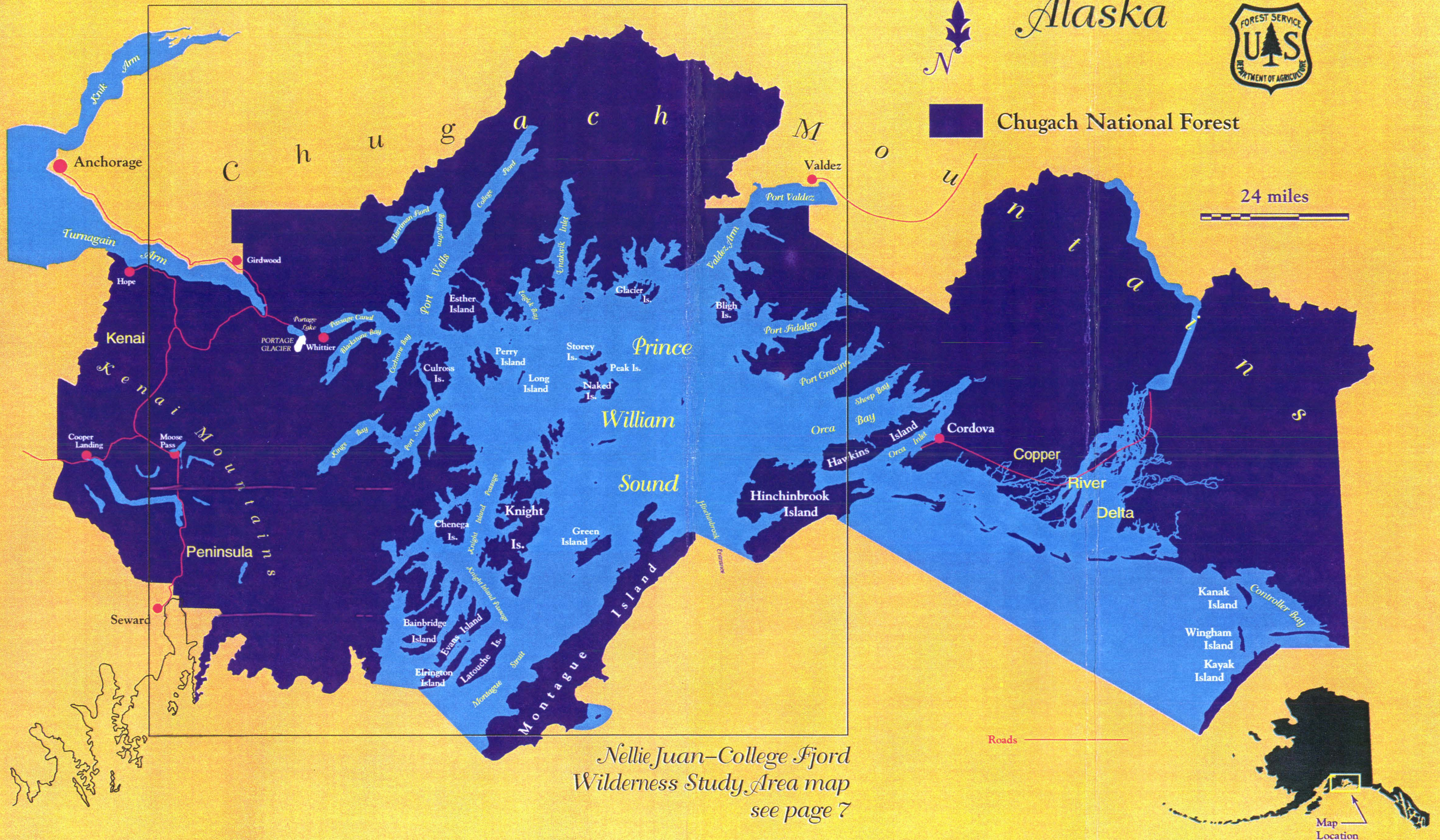
- Keep the map fluid by adding appropriate campsites and moving/removing campsites as more archeological information is available. Outfitter-guides could choose where they wish to camp from the designated sites on the map. Assigning campsites for outfitter-guides for particular nights is not recommended because of weather and risk factors.
- Monitor acceptance or rejection from the outfitter/guides regarding campsite designation, map information, education and safety messages.
- Create a data base that shows: which outfitter/guide group used what campsite and when. This data could lend itself to later carrying-capacity studies.
- Have maps available to the private kayaker who wants camping information.
- Glacier Ranger District host a yearly meeting with outfitter/guides to discuss archeological, safety, camping and permitting concerns.

Chugach National Forest Alaska

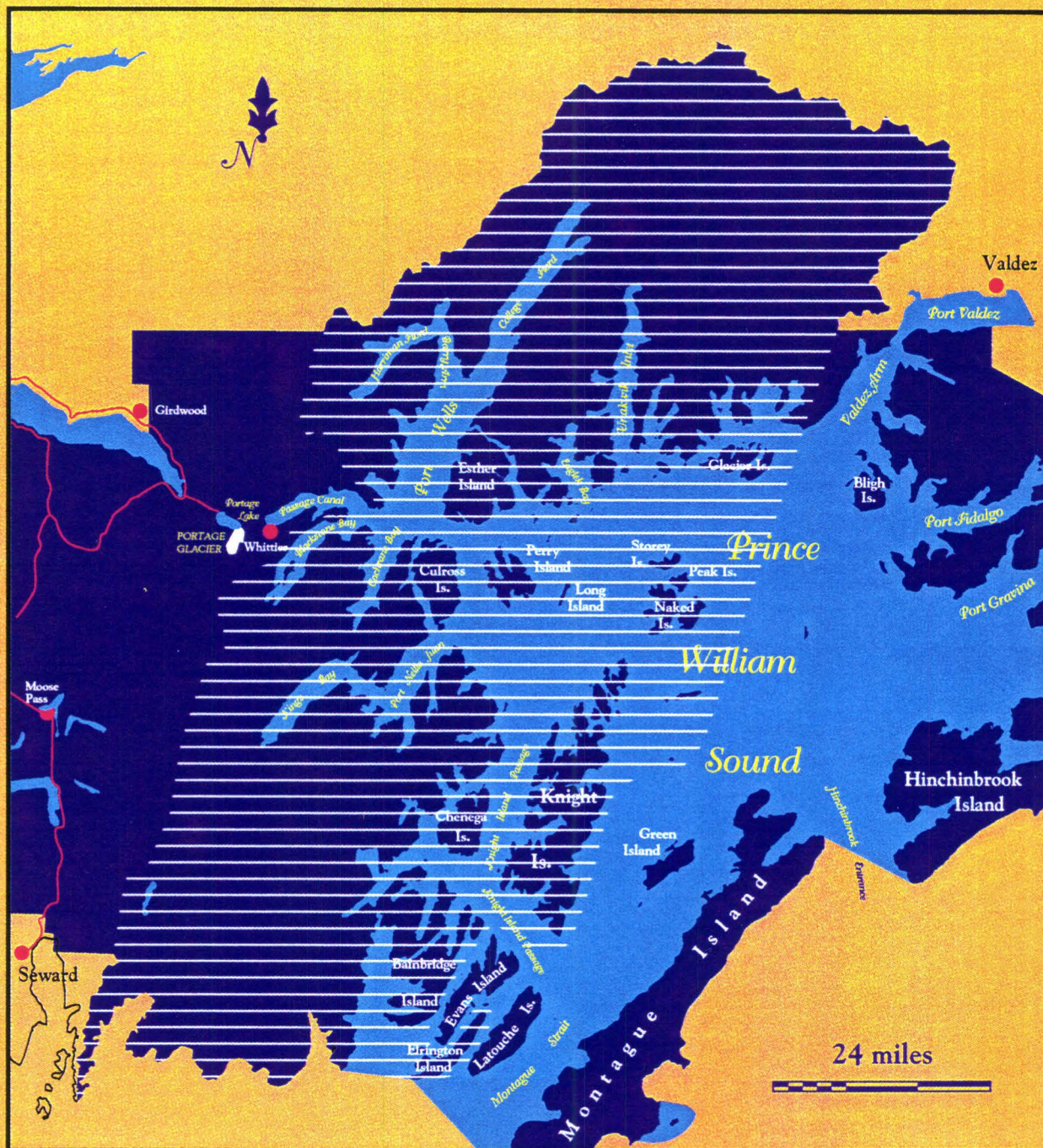


Chugach National Forest

24 miles

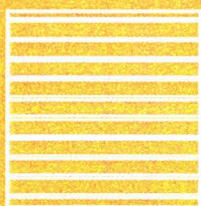


Nellie Juan-College Fjord
Wilderness Study Area map
see page 7



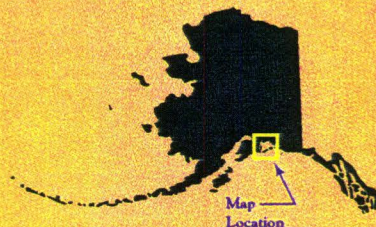
Nellie Juan-College Fjord Wilderness Study Area

*Chugach National Forest
Alaska*



Nellie Juan-College Fjord
Wilderness Study Area

Chugach
National
Forest



INTRODUCTION

STATEMENT OF PURPOSE

The purpose of this project is to designate campsites in the Nellie Juan-College Fjord Wilderness Study Area (WSA) in order to protect cultural resource sites. Currently, the majority of users of campsites in the WSA are outfitter-guided sea kayakers. This project will use the Geographic Information System (GIS) to designate campsites by overlaying typically used campsites over known and mapped cultural resource sites. Campsites located at or near cultural resource sites will be deleted from the GIS map. Data compiled from this project can be used to regulate future public use of campsites where known cultural resource sites exist.

The need for designating campsites came about during the process of writing an environmental assessment for issuing Special Use Permits to sea kayak outfitter-guides in the WSA (Appendix F). Prior to September, 1992, proposed actions in the WSA were categorically excluded from documentation in an environmental impact statement (EIS) or environmental assessment (EA). When the National Outdoor Leadership School (NOLS) Special Use Permit came up for renewal in 1993, an EA was written because any action in the WSA fit into the following category as defined by the Federal Register (Vol. 57, No. 182 / Friday, September 18, 1992 / Notices, Page 43208): "A proposed action may be categorically excluded from documentation in an EA only if there are no extraordinary circumstances related to the proposed action. Extraordinary circumstances include, but are not limited to, the presence of the following: Congressionally designated areas such as wilderness, **wilderness study areas**, or National Recreation Areas."

During the scoping process for the EA, John Johnson, Cultural Resource Manager for the Chugach Alaska Corporation (CAC), stated the following concerns: "Request that no camps be set up at the southern end of the pass on XXXX Island due to prehistoric remains that have been documented by CAC and BIA in 1992". His letter listed several other camps where there was recreation/cultural resource conflict. John L. Mattson, Chugach National Forest Archeologist made the following recommendation in his *Heritage Resources Report on the Existing and Proposed Camping Sites Identified by the National Outdoor Leadership School (NOLS)*, May 7, 1993: "I recommend that the following action be taken on the listed existing or proposed NOLS campsites which are congruent with Alaska Native Claims Settlement Act (ANCSA) 14 (h)(1) sites determined eligible for conveyance. Notify NOLS that they may no longer use this particular site but may identify another in the vicinity for potential use, subject to Forest review and approval. This recommendation applies to the maps and sites listed in the appendix." (Appendix C)

When NOLS was issued their special use permit (SUP), the face of the permit listed 22 locations where camping was not allowed. Subsequent kayak and hunting

outfitter/guides have been issued SUP's with the same restrictions. It has become apparent that the Forest Service needs to designate camping areas for outfitter-guides in the WSA. The result of this report will be a map showing outfitter-guides where they can camp rather than where they cannot camp. Listing areas where camping is not allowed actually gives the permittee a clue as to where cultural resource sites are located.

MANAGEMENT DIRECTION

The Alaska Regional Guide (USDA Forest Service, Regional Guide for the Alaska Region, Dec. 1983) and the Chugach Land and Resource Management Plan of 1984 (Forest Plan), as amended, provide the framework for management of the Chugach National Forest. Specific Forest Plan goals with respect to the desired future condition as it pertains to designated campsites in the WSA (USDA Forest Service. 1984a: pIII-3) follow:

"Contribute a proportionate share of the Southcentral Alaska supply of recreation opportunities, wilderness, wildlife and fish habitat, minerals and timber."

"Where possible, contribute to the local economy and provide for community stability."

"Provide for the production of various Forest goods and services while minimizing adverse social, economic and environmental effects."

Region 10 Supplement 2300-92-1 provides Regional guidelines and policy for managing wilderness and wilderness study areas within Alaska. The Chugach Forest Plan provides guidelines for management of wilderness (USDA Forest Service. 1984a: pIII-4):

"Until the Congress acts on the wilderness recommendations, the areas recommended and the Nellie Juan-College Fjord Wilderness Study Area will be managed to maintain their presently existing character. Wilderness designation by Congress will be managed as directed by the 1964 Wilderness Act and the 1980 Alaska National Interest Lands Conservation Act (Alaska Lands Act)."

"Recommend to Congress that approximately 1,703,000 acres be formally designated as part of the National Wilderness Preservation System." (USDA Forest Service. 1984a:PIII-25).

The Prince William Sound Area Plan for State Lands recommends similar management to the Chugach Forest Plan:

"Protect the recreation resources that the public comes to see and use including public access, visual resources, and where appropriate, the isolation and unique wilderness characteristics of Prince William Sound." (State of Alaska. 1988:P2-27) (Appendix E).

In summary, the area is to be managed to preserve the wilderness character of the area and protect cultural resources while providing for growing dispersed recreation opportunity.

ARCHEOLOGICAL BACKGROUND

Prince William Sound gained instant notoriety on March 24, 1989 at 12:04 a.m. when the *Exxon Valdez* ran aground on Bligh Reef, 25 miles south of Valdez, Alaska. Before that date and time, mostly Alaskans and sea kayak outfitter-guides like NOLS knew about the jewels buried within Prince William Sound. Roughly 4,800 km of shoreline define the bays and islands of the Sound (Grant and Higgins 1910:15; N. Lethcoe 1987:1 as quoted by Yarborough & Yarborough 1993). A total of 1.7 million acres are within the Nellie Juan College Fjord Wilderness Study Area (USDA Forest Service 1984a: II-7). To date, 292 archeological sites have been located on or near the shoreline in Western Prince William Sound. Archeological sites were first recorded by Birket-Smith (1953) and de Laguna (1956) (Yarborough & Yarborough 1993), just before Alaska became the 49th State. Knowledge of this area's archeology is quite meager. The most significant archeological research in Prince William Sound to date was performed by Frederica de Laguna (1956) during the summers of 1930 and 1933. The majority of archeological work conducted in Prince William Sound includes the following: Collections from burial caves by Jacobsen in the late nineteenth and Meany in the early twentieth centuries (de Laguna 1956:90-91); site identification and recording in conjunction with the Alaska Native Claims Settlement Act 14 (h)(1) selections; a survey by John Lobdell (1976); limited survey and testing of sites by archeologists from the U.S. Forest Service; and site inventory by Chugach Alaska Corporation (Yarborough & Yarborough 1993).

During the summer of 1988, Michael R. and Linda F. Yarborough spent six weeks excavating at Uqciuvit, a large village site in northwestern Prince William Sound (Yarborough and Yarborough 1991). In 1989, archeologists employed by Exxon surveyed approximately 1600 km of shoreline in areas of southwestern Prince William Sound impacted by the *Exxon Valdez* oil spill (Exxon Shipping Company and Exxon Company, USA, - Mobley et al. 1990:170). Exxon archeologists returned to the Sound during the summer of 1990 for additional oil spill-related survey work (Exxon - Haggarty and Wooley 1990). In 1991, personnel from the State University of New York (SUNY) at Binghamton and the Alaska Office of History and Archeology (OHA) conducted independent field studies to assess the effects of oil contamination on selected sites along the northern Gulf of Alaska coast (Dekin 1993; Reger et al. 1992, as quoted by Yarborough & Yarborough 1993). The SUNY Binghamton and OHA archeologists surveyed and tested six different sites in the Sound. In the summer of 1993, Linda Yarborough lead a group of volunteers who participated in the "Passports in Time" program. They escavated a cultural resource site named Seward 430.

Western Prince William Sound was inhabited by two closely related groups of Pacific Eskimo called the Chugach Eskimo (Birket-Smith 1953:18, as quoted by Yarborough &

Yarborough 1993). Historically, Prince William Sound was occupied by eight geographic groups of Chugach Eskimo. Each group was politically independent with its own leader and principle village, and shared the same language and culture (de Laguna 1956:27).

The Chugach Eskimo cultural development appears to have been greatly influenced by the particular characteristics of Prince William Sound landscape. Explorers comments (cf. Vancouver 1967:197 as quoted by Yarborough & Yarborough, 1993) and census reports indicate that the early historic period population in the Sound was "strikingly and consistently" low (de Laguna 1956:256). Explorers' impressions and census figures agree with the archeological evidence. During her surveys, de Laguna (1956:255-256) found relatively few sites, and none of those were described as a large village. She also noted several long segments of coastline where there were no sites. Villages were often placed in a "strategic position" that "commanded a view of the approaches" (de Laguna 1956:11). It may be that Prince William Sound was simply not capable of supporting a large population (Yarborough and Yarborough 1993). Seismic activity as well as climatic fluctuations may have had a profound effect on the resources in this region. Shellfish were severely impacted by the 1964 earthquake, which killed an estimated 36 percent of the hard-shell clams and 90 percent of the blue mussels in Prince William Sound (Baxter 1971:238,245 as cited by Yarborough and Yarborough 1993). The earthquake also killed thousands of rock fish, flat fish, and cod, and salmon returns to Montague Island. Those returns estimated at 700,000 before 1964, were only about 20,000 in 1969 (Harry 1971:2, 4 as cited by Yarborough and Yarborough 1993).

Cultural chronology in Prince William Sound is known primarily from the excavations at Palugvik and Uqciuivit (Yarborough and Yarborough 1991). Uqciuivit occupation lasted for over 3,600 years with only one major break, while the Palugvik was inhabited from approximately 2,000 years ago until some unknown date prior to contact (Clark 1984a:145, Figure 2; W. Workman 1980:80 as cited by Yarborough and Yarborough 1993).

The earliest known occupation of the sound, termed the Uqciuivit phase, is dated to between about 4,400 and 3,300 years ago. Very little is known about the people of this pre-Neoglacial phase, except that they hunted sea mammals, used red ocher, and were familiar with slate grinding for making tools (Yarborough and Yarborough 1991).



CULTURAL RESOURCE PROTECTION

The majority of cultural resource sites located in Prince William Sound have been selected for ownership by Chugach Alaska Corporation (CAC) under the terms of Section 14 (h)(1) of the Alaska Native Claims Settlement Act (ANCSA) of 1971. Section 14 (h)(1) states: "The Secretary (of the Interior) is authorized to withdraw and convey 2 million acres of unreserved and unappropriated public lands located outside the areas withdrawn by sections 11 and 16, as follows: (1) The Secretary may withdraw and convey to the appropriate Regional Corporation fee title to existing cemetery sites and historic places." The definition of cemetery sites and historic places is provided in 43 Code of Federal Regulations (CFR), Chapter II: "(1) *Cemetery sites*. The Bureau of Indian Affairs shall certify specifically that the site is a burial place of one or more Natives. The Bureau of Indian Affairs shall determine whether the cemetery site is in active or inactive use, and if active, it shall estimate the degree of use by Native groups and villages in the area which it shall identify. (2) *Historical places*. The Bureau of Indian Affairs shall describe the events that took place and qualities of the site which give it particular value and significance as a historical place."

Evaluation and reevaluation of these selections is still in progress by archeologists of the ANCSA office of the Bureau of Indian Affairs (BIA). None of the sites have been adjudicated or conveyed by the Bureau of Land Management (BLM), but the current state of evaluations indicates this action is likely to occur in the near future (Mattson, 1993). ANCSA 14(h)(1) sites which have been evaluated by BIA archeologists and issued a certificate of eligibility for conveyance are considered eligible for the National Register of Historic Places (NRHP), and they must be managed as such (Mattson, 1993). The same holds true for archeological sites discovered during the *Exxon Valdez* Oil Spill (EVOS). Until conveyance to the Native Corporation or termination of the Cultural Resources Memorandum of Agreement (Exxon, 1990), the Forest Service is responsible for protecting these sites under the provisions of the National Historic Preservation Act (NHPA), 36 CFR 800 and the Archeological Resources Protection Act (ARPA), 36 CFR 296.

Of the 292 cultural resource sites located within the Nellie Juan-College Fjord Wilderness Study Area (WSA), Glacier Ranger District, more than half of those sites meet the criteria as an ANCSA 14(h)(1) site for being conveyed to the Chugach Alaska Corporation. There is no maximum number of sites that can be conveyed to the Regional Corporation. Nor, is there any final date when sites must be conveyed. Any campsite designation must remain in a fluid state since ANCSA 14(h)(1) sites are in the process of being evaluated and reevaluated, and 14(h)(1) sites designation is in the state of fluctuation. In order for a site to be conveyed, BIA archeologists evaluate the site and issue a certificate of eligibility as an ANCSA 14(h)(1) site found eligible for the National Register of Historic Places. For this project, only the cultural resource sites that have ANCSA 14(h)(1) designation were removed as campsites that could be used by outfitter-guides. Any previously used campsites that were located at or near 14(h)(1) sites were not listed on the final map provided to outfitter-guides for camping.

NELLIE JUAN-COLLEGE FJORD WILDERNESS STUDY AREA

The Nellie Juan-College Fjord Wilderness Study Area (WSA) is located in western Prince William Sound on the Glacier Ranger District, Chugach National Forest. The 1.7 million acres was designated wilderness study area in 1980 with the signing of the Alaska National Interest Lands Conservation Act (ANILCA) into law. Section 704 of ANILCA states: "In furtherance of the purposes of the Wilderness Act the Secretary of Agriculture shall review the public lands depicted as 'Wilderness Study' on the following described map and within three years report to the President and the Congress in accordance with section 3(c) and (d) of the Wilderness Act, his recommendations as to the suitability or non suitability of all areas within such wilderness study boundaries for preservation of wilderness: Nellie Juan-College Fjord, Chugach National Forest as generally depicted on a map entitled 'Nellie Juan-College Fjord Study Area', dated October 1978." (Public Law 96-487, December 2, 1980).

The Exxon Valdez Oil Spill Trustee Council Restoration Office completed a survey of a broad cross-section of commercial and non commercial recreational user groups and land managers in 1992. A common theme from the responses of most user groups was a desire to preserve and protect the "wilderness character" of the Sound (Whittier Access Project Pre-Draft EIS, February 1994, 6-38). A nationwide survey following the *Exxon Valdez* oil spill indicated that 83% of Americans would pay to protect the natural environment of the Sound (Carson et al 1992, as quoted from Whittier Access Project Pre-Draft EIS, 1994, 6-38).

PROJECTED GROWTH IN THE WSA

Recreational use of the WSA is expected to increase. Use could increase dramatically if the Whittier Access Project is approved.

The Whittier Access Project is being proposed by the State of Alaska Department of Transportation and Public Facilities. Currently, the only way to reach the town of Whittier (gateway to Prince William Sound and the Nellie Juan-College Fjord Wilderness Study Area) is via the Alaska Railroad train, Alaska Marine Ferry service, or air service. The Whittier Access Project proposes that a road be built between the town of Portage and Whittier. An Environmental Impact Statement (EIS) is being written to evaluate different alternatives for providing passenger vehicle transportation to Whittier. It is believed by many that if access to Whittier becomes easier, visitor use will increase dramatically. In order to reach Whittier at this time, one must drive from Anchorage 40 miles south to the Portage train station. At Portage, one boards a train as a passenger or drives a vehicle onto the train. 1994 train ticket prices are \$13.00 one-way for foot passengers and up to \$147.00 one way for vehicles. The train travels between Portage and Whittier six times a day in the summer and five times a week in the winter.

Currently, the Alaska Railroad shuttle between Portage and Whittier has a maximum daily capacity of 360 vehicles and 5,220 coach passengers. Current annual ridership is 191,200 passengers (one way trips) and 20,100 vehicles (one way trips) (Whittier Access Project Pre-Draft EIS, 1994, 2-1). If Alternative 3 or 4 of the Whittier Access Project is selected, 800,000 people could drive to and from Whittier in the opening year (1997), and over 1.4 million people could drive to and from Whittier in the design year (2015)(Northern Economics, 1993, quoted from Whittier Access Project Pre-Draft EIS, 1994, 5-33).

The number of outfitter/guides who lead sea kayaking, skiing, hunting and camping trips into the Sound is increasing so quickly and by such large numbers, it appears that the time has come to designate sites for outfitter-guides. If use increases to rates described by the Whittier Access Project, Glacier Ranger District may decide to designate campsites for private users as well as outfitter-guides in the Nellie Juan-College Fjord Wilderness Study Area (WSA). Often the best camping sites for groups of 10 or more are archeological sites. The criteria for good camping beaches are much the same now as they were for the Chugach Eskimo who subsisted in Prince William Sound 4,400 years ago. Furthermore, land ownership in Prince William Sound is very complex, constantly changing and not easily understood without a Geographic Information System (GIS) generated land ownership map. The State of Alaska, Chenega Village Corporation, Eyak Village Corporation, Tatitlek Village Corporation, and Chugach Alaska Corporation are in the process of making final selections of land (as stipulated by the Alaska Statehood Act and the Alaska Native Claims Settlement Act). Combining designated camping site information with land ownership on a GIS map will help the outfitter/guide avoid archeological sites and trespassing on Native, State, or private land.

Clearly, recreational use in the Sound could increase dramatically in a very short time frame. Designating campsites in the WSA for outfitter-guided groups could be an important first step to designating campsites for the recreational user if a road is built to Whittier and use increases from the current 211, 300 people (Alaska Railroad, 1993) to the projected 1.4 million people.

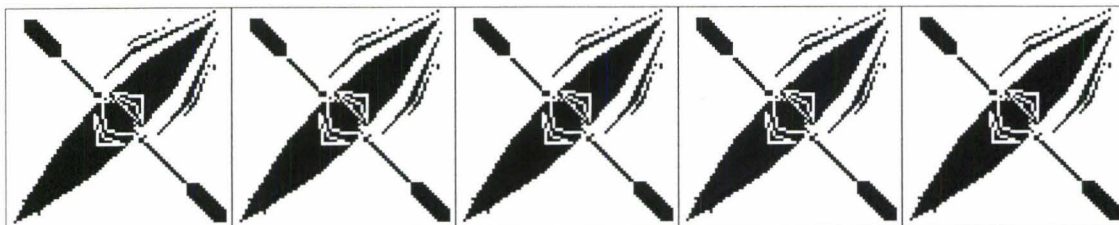
KAYAK USE IN PRINCE WILLIAM SOUND

Sea kayaking in Nellie Juan-College Fjord Wilderness Study Area (WSA) by both private and commercial users has been steadily increasing. A Limits of Acceptable Change (LAC) study was funded in 1992 and 1993 to establish a baseline of use. A study done by Paul Twardock, 1992 (*Kayak Use in Prince William Sound 1987 to 1991*) was the first to provide information and data about non consumptive/recreational use in Prince William Sound. Based on his data, it appears that sea kayaking use in the WSA is increasing by approximately 10% per year. For example, in 1990, the U.S. Forest Service permitted three guides with Special Use Permits. In 1994, the U.S. Forest Service will permit eight sea kayak guides. The main reason for the increase could be linked to the 1989 *Exxon Valdez* oil spill and focused attention on Prince William Sound. Settlement

agreements between State of Alaska, Federal agencies and Exxon will continue to focus attention on the Sound for the coming decade and beyond (Twardock, 1992).

Kayaking in Prince William Sound probably began with its Native inhabitants, the Chugach Eskimo, or Aleuts as they prefer to call themselves today (Mattson, 1993). Native kayaks were used primarily for travel and subsistence pursuits. Today, the sea kayak is used primarily for recreational pursuits. However, the criteria used for good campsite locations for today's kayaker are quite similar to those used by the Aleuts: a good beach in a protected setting with fresh water and food resources nearby. Hence, the problem: many modern-day sea kayak camping sites are located on or near archeological or historic sites. A published map and guide entitled *Kayak Routes & Camping Beaches in Western and Central Prince William Sound, Alaska* (Weaverling, 1987) is the most current camping guide available to outfitters or the public. The main problem with the existing map is that several camping sites are located on Native Corporation land and/or near archeological sites. Any outfitter-guide or private individual who camps on Native land must have a permit; Chenega Corporation charges the National Outdoor Leadership School \$1,000.00 base per year plus \$1.90 per person per day (Appendix B). Outfitted/guided camping on State land requires a permit; the cost for the permit is a \$100.00 application fee plus a yearly permit fee of up to \$1000.00 (personal conversation with James Renkert, Alaska Department of Natural Resources, March, 1994).

To date, there has been no effort to designate campsites in the WSA for outfitter/guides or the private recreationalist. Some users believe that designating campsites could lead to Prince William Sound becoming too "civilized" with a perceived loss of wilderness character and adventure. Paul Twardock (NOLS instructor and author of *Kayak Use in Prince William Sound 1987 to 1991*) has been approached by several parties wanting him to write a book or guide for camping in Prince William Sound. He has refused because he believes that a guide book would ruin the sense of adventure one feels when entering the WSA and Prince William Sound. Mr. Twardock also believes that designating campsites for outfitter/guides may cause some campsites to be overused. His point is that private boaters notice where the outfitter kayak groups camp and tend to use those sites rather than discovering their own sites (Appendix B). His viewpoint is understandable and should be taken into consideration for future planning, especially if the Forest Service decides to designate camping for the private user.



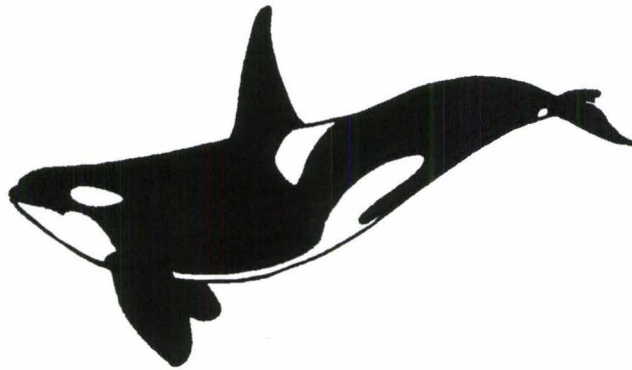
LITERATURE REVIEW

Literature which provided direction for campsite designation in the WSA includes the following:

1. *Kayak Use in Prince William Sound 1987 to 1991*, 1992 by Paul Twardock provided camping trends, data based on gross revenue, and a summary by user days/camping locations.
2. *Alaska Heritage Resources Survey*, kept up-to-date by the State of Alaska State Historic Preservation Officer, lists all cultural resource sites in the WSA. This survey was used to determine the sensitivity of each site in relation to nearby camping areas. This material is highly sensitive and will not be included in any information given as a result of this paper.
3. *Coastal Resource Prince William Sound*, Draft 1992, is a resource document that provides information for the Environmental Section Chief and the Incident Commander associated the Exxon-Valdez Oil Spill Team. The information was used to locate possible campsites. Geological beach information is in 1"=4,200' map detail. This document was used to verify good camping beaches based on geology, slope and high-tide line.
4. *Regional Overview of Prince William Sound and the Pacific Coast of the Kenai Peninsula*, 1993 by Michael R. Yarborough and Linda Finn Yarborough was used for the overview it provided about the origin, development and spread of prehistoric North Pacific cultures.
5. *Heritage Resources Report on the Existing and Proposed Camping Sites Identified by the National Outdoor Leadership School (NOLS)*, 1993 by John L. Mattson, Chugach National Forest Archeologist was used for background and recommendations regarding camping sites in the WSA.
6. *A Chart of Kayak Routes & Camping Beaches in Western & Central Prince William Sound, Alaska*, 1987 by Charles K. Weaverling. Information in this chart was used for plotting campsites in Western Prince William Sound. However, several of the campsite locations could not be used because they are located on Native Corporation land.
7. *Prince William Sound Area Plan for State Lands*, June 1988, State of Alaska Department of Fish and Game and State of Alaska Department of Natural Resources. The "Recreation, Tourism, Cultural and Scenic Resources" section of this plan was referred to for consistency between Federal and State management of campsites in Prince William Sound.

8. *Whittier Access Project - Pre-Draft Environmental Impact Statement and Draft Section 4(f) Evaluation*, February 1994, State of Alaska Department of Transportation and Public Facilities and Federal Highway Administration. Provided a very detailed analysis of current conditions and projected conditions in the Nellie Juan - College Fjord Wilderness Study Area.

9. *Wilderness Campsite Monitoring Methods: A Sourcebook*, 1989 by David N. Cole. Once campsites for outfitter/guides are designated, this document summarizes information on techniques available for monitoring the condition of campsites.



METHODOLOGY

RESEARCH METHODS - DEVELOPMENT OF ALTERNATIVES

The most important research method used was the Geographic Information System (GIS). The information provided by GIS included:

1. Land Ownership
2. Archeological Sites
3. Camping location information gathered from NOLS, Steve Hennig (USFS), Ken Holbrook (USFS), Ron Kent (BIA), John Johnson (CAC) and Paul Twardock (ex-NOLS Instructor).

The land ownership and archeological site layers had been previously inputted and were available during the time of this project. The camping location information was gathered and given to GIS for input. Several GIS map layer outputs were utilized for the final campsite map. The designated campsite map is included with this document (Appendix A) and will be attached to all special use permits issued to outfitter-guides who use the WSA.

Several alternative methods exist for locating campsites in the WSA that avoid archeological (14(h)(1)) sites. The method chosen included the following steps:

1. Host a meeting to evaluate issues and concerns regarding campsite selection.
2. Input campsite locations into the GIS system.
3. Overlay campsites onto archeological site locations with consideration given to land ownership (no campsites would be located on Native Land). Several campsites were located on State land after permission was received from Jack Sinclair, Alaska State Parks (telephone conversation 11/93).
4. Hold meeting to discuss controversial camping sites. Best alternative camping site locations were recommended to District Ranger John Dorio for his final decision.
5. Product: A map showing designated campsites that can change and grow over time.

DISCUSSION

Meeting - November 17, 1993:

The first meeting to discuss the campsite project was held on 11/17/93 (Appendix B). A summary of that meeting follows:

Present at the Meeting:

Elaine Gross, Project Facilitator, Glacier Ranger District
John Mattson, Chugach National Forest Archeologist
John Johnson, Chugach Alaska Corporation Archeologist
Don Ford, NOLS Branch Leader, Alaska
Paul Twardock, NOLS Instructor, currently Director of
Recreational Sports & Facilities at Alaska Pacific University
Susan Rutherford, Recreation Staff Officer, Chugach NF

The purpose of the meeting was to discuss the implications of designating campsites in the WSA. The reason for designating sites is to avoid impact on archeological resources. While NOLS is well known for its philosophy of "no impact camping" with little or no disturbance of the subsurface estate, the anticipated cumulative effects of increased site usage by NOLS and others cannot help but have some negative impacts over time, particularly on archeological resources. This anticipated increased use upon National Register of Historic Places eligible properties must be taken into consideration (Mattson, 1993). Campsites would be designated for outfitter-guide use. It was brought up that once private users notice where outfitter-guides are camping, private use of the sites will likely increase.

We discussed the buffer zone that surrounds 14(h)(1) sites. As stated in 43 CFR 2653.5 (2)(m): "The zone is no more than 330' around historic sites and 66' around cemetery sites". John Johnson and John Mattson believe that 66' is too small for the buffer zone around cemetery sites.

Chugach Alaska Corporation (CAC) may be interested in joint management of 14(h)(1) sites. For example, after a site is inventoried and surface collected, the site could be interpreted for the public and guided groups. Outfitter-guides might be potential partners in site interpretation. Any monitoring activity on Native-selected historical sites should be done by Native Corporations.

We discussed Forest Service management and using NOLS as possible partners/stewards of the WSA. Don Ford talked about Leave No Trace (LNT) camping and education. NOLS has approximately 3,600 person-days per season in the WSA. Everyone agreed that public education at points of entry to Prince William Sound (Whittier, Valdez and Cordova) is very important, as well as law enforcement as a deterrent.

The possibility of building tent platforms in areas where no beach exists was discussed. In some areas, kayakers must paddle long distances to beaches that avoid archeological sites. Tent platforms could be erected on rocky shores, thus providing more camping opportunities where none currently exists. Don Ford stated that NOLS would not care to use tent platforms. Mr. Ford said that the only place where tent platforms may be appropriate are areas of massive use, like certain locations in Passage Canal. John Johnson said that graveled pads would be preferred to wooden tent platforms. NOLS only camps on beaches because that impacts an area the least. NOLS would like to see something in the middle between detailed maps/designated sites and providing no information at all.

Don Ford talked about projected use of Prince William Sound. Alaska Department of Transportation supplied the following figures: There were 200,000 visitor days in 1992. If the road to Whittier is built, use is projected to be 1,900,000 visitor days in 1997. We need to be prepared for that type of increase in visitation to Prince William Sound. It appears that designating campsites for outfitter/guides now and private users later is very timely.

It was agreed that Elaine Gross would work closely with John Johnson to determine where campsites would be located to avoid 14(h)(1) sites.

NOLS has developed a way for lessening impacts through intentionally dispersing the use. They try not to visit the same place twice in the same season. Don Ford said it is impossible to pre-determine camping areas because the weather is always changing. It would not work to designate campsites for particular dates.

John Johnson stated that CAC would like to partner with NOLS in providing increased recreation opportunities for the sea kayaker. Safety concerns would also be met if there are more locations for camping.

Don Ford talked about being broad-based. In NOLS classes, all sorts of information is provided to the kayaker, including (LNT) principles, avoidance of archeological sites, navigation, weather, safety and hazard analysis. If a group is already using a campsite, NOLS always selects another site. Outfitter/guides must also be sensitive to sea lions, eagles, subsistence use and pupping areas.

There is a need to develop a brochure and incorporate wording in Special Use Permits that govern visitation to ANCSA 14 (h)(1) sites. Beginning this season, the Forest Service would like to host a 1-2 day meeting with all outfitter/guides about Leave No Trace principles and sensitivity to cultural resources.

The main product developed from this project would be a map showing camping beaches that avoid 14 (h)(1) sites and shows current land ownership. LNT principles and safety tips could be listed on the reverse of the map.

Paul Twardock had some concerns regarding a map that would show all of the camping beaches in the WSA. One concern was liability: Would the Government want the liability of listing places to camp and having the public sue if something went wrong... earthquake, high-high tide, etc.? Furthermore, if campsites are noted on a map, more use may occur. Paul has been approached several times regarding writing a book on camping in Prince William Sound. He has refused because of the increased use such a book would invite. Paul believes people should be taught how to camp in the WSA, not where to camp. Education is very important.

Susan Rutherford added her comments at the end of the meeting. She stressed that the information being gathered for the project would help in future land management decisions. Products such as maps would have to be decided upon. Sensitivity to creating more use in Prince William Sound by providing maps would be taken into consideration.

Geographic Information System (GIS):

Obtaining data inputted to and generated from the Geographic Information System (GIS) was the most important ingredient to the success of this project. The cost of GIS-generated maps was \$100.00 per map. Mylar overlays were \$25.00 each. The final product (black and white GIS map, Appendix A) was \$4.00 per map. The majority of funding for this project (\$500.00) was spent on GIS-generated maps. The District Ranger paved the way for GIS support by making this project the #1 District priority because of its short time frame (November, 1993 - March, 1994). At the time, there were no major conflicts with other Chugach Forest GIS projects, so products were received in a short turn-around time. Since April, 1994 the GIS Shop has been unable to accept any new projects, so timing of this project was impeccable.

On January 12, 1994, the GIS map was completed showing archeological sites within the Glacier Ranger District and the WSA (Western Prince William Sound). The original site information was received from the State Historic Preservation Officer (SHPO). On January 20, 1994, I met with Archeologist Joan Dale who records all information for SHPO. The purpose of the meeting was to verify archeological site locations on the GIS map and to add any new sites to the GIS map. A total of 44 new sites were added to the GIS map (copied from SHPO quad maps). Information on the 44 additional sites was relayed to the Forest Service GIS group.

On January 18, 1994, the GIS map showing campsite location and land ownership was completed. Campsite location information had been obtained from quad maps provided by NOLS during the writing of the environmental assessment for issuance of their special use permit for outfitting/guiding sea kayaking in Prince William Sound. NOLS listed all places they had camped during the 20 years they have operated in the Sound. Information was also received from the publication *Kayak Routes and Camping Beaches in Western and Central Prince William Sound, Alaska* (Weaverling, 1987). The campsite location map was overlaid onto the archeological site map so that conflicts between

campsites and archeological sites could be visually confirmed. During this process, 17 campsites were cut from possible campsite locations due to archeological site conflicts.

On January 27, 1994, I met with Steve Hennig, Landscape Architect, Chugach National Forest to discuss additional campsites he recommended (Mr. Hennig has spent 15 years recreating in PWS). I also met with Ken Holbrook who works in the Exxon Valdez Oil Spill (EVOS) coordination group. As a Forest Service employee and privately, Mr. Holbrook has spent numerous years in PWS; he was able to provide me with more campsite information. He is also working on a project for the EVOS group to list all recreational sites and input information into the GIS system. This project will be shared with EVOS for coordination on recreation and camping site mapping.

On February 1, 1994, I met with Ron Kent, Archeologist for the Bureau of Indian Affairs, regarding additional archeological sites; those sites were hand-plotted on the GIS map. On February 22, 1994, the campsites were re-plotted on the GIS map overlay.

Meeting - February 24, 1994:

Present at the meeting:

Elaine Gross - Project Manager

Ron Kent - Bureau of Indian Affairs Archeologist

John Mattson - Chugach National Forest Archeologist

Linda Yarborough - Chugach NF Archeologist (briefly at meeting)

Joan Dale - State Historic Preservation Office Archeologist

Purpose of the meeting was to discuss the re-plotted GIS campsite map overlay. Campsites that conflicted with ANCSA 14 (h)(1) archeological sites were discussed. The group spent several hours discussing individual campsites and how they might conflict with cultural resource sites. For example, Joan Dale was against having campsites located near old mining sites that could be damaged by hikers. Furthermore, Ms. Dale brought up a liability problem regarding visitors who might get hurt while visiting an historic mining site. While mining site information is important, ANCSA 14 (h)(1) sites do not include historical mining sites. I agreed to report the State's concerns about historic mines to the District Ranger. I also stated that historic mining sites and conflicts with campsites was outside the bounds of this project. Several members of the group thought that the XXXX Point site could be listed as a campsite because camping is on the beach and the 14 (h)(1) site is located inland on the spit. Furthermore, the XXXX Point campsite provides a great location for watching the seas before making the crossing (sea kayakers spend much time watching the ocean before crossing a large body of water). I stated that Glacier District Ranger John C. Dorio would hear all of the recommendations before he made a decision about individual camping sites. As it turned out, Ranger Dorio made the decision not to allow camping on XXXX Point because it was too close to the protected 14 (h)(1) site. After several hours of discussion, concurrence was achieved within this group.

Later in the day of February 24, 1994, Elaine Gross met with John Johnson, Chugach Alaska Corporation Archeologist, to receive his input for campsite designation. Mr. Johnson chose not to meet with the other archeologists listed above because he felt there could be conflicts about interpretation of the importance of each archeological site. His input was received separately and presented to the Ranger at the same time all other input was presented.

Recommendations were made so that a final decision about campsite designation could be made by Glacier District Ranger John C. Dorio. Meeting notes are not a part of the Appendix because specific archeological sites were discussed, and the information is sensitive and confidential.

On February 25, 1994, Elaine Gross met with John C. Dorio, District Ranger. Mr. Dorio considered all the input received from archeologists review of the campsite GIS overlay. Recommendations from all the archeologists were taken into consideration before any decisions were finalized. The Ranger's point of view is conservative regarding ANCSA 14 (h)(1) sites. If there were any questions about campsite/archeological site conflicts, the Ranger consistently chose protection of the 14 (h)(1) site over authorizing additional campsites. A total of five more campsites were added to the 17 previously removed campsites, for a total of 22 total removed campsites. The overlay Mylar was finalized for GIS printing.

Meeting - April 18, 1994:

A meeting was held April 18, 1994 for outfitter-guides who offer sea kayak trips in the WSA. The following people attended the meeting:

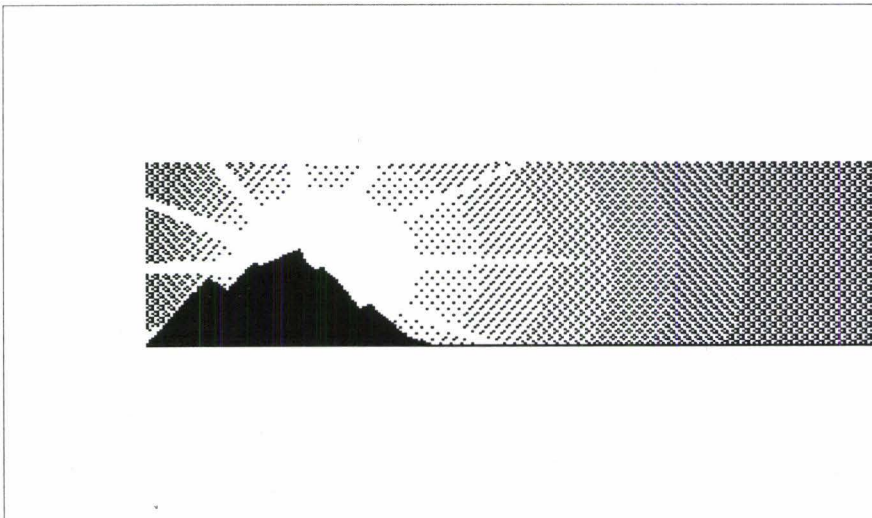
Brad von Wichman - Alexandra, Inc.
McGill Adams - Wilderness Alaska
Eleanor Huffines - National Outdoor Leadership School (NOLS)
Don Ford - Director, Alaska Branch NOLS
Kimmer Ball - Adventures & Delights
Paul Twardock - Alaska Pacific University & past NOLS instructor
John Mattson - Chugach Forest Archeologist
Nancy Gehm - Seward Ranger District & Leave No Trace Master
Elaine Gross - Permit Administrator and Project Manager

See Appendix G for meeting notes.

SUMMARY

The outcome of this paper is a GIS map that shows the proposed designated campsites in the Nellie Juan College Fjord Wilderness Study Area (Appendix A). Designated campsites are for outfitter/guide use. A GIS map showing designated campsite locations will be attached to all Special Use Permits issued to outfitter/guides who are authorized for camping activities in the WSA. The intent of creating the designated camping map is to protect cultural resource sites that may have been inadvertently used for camping in the past. The 292 cultural resource sites located within the WSA will receive more protection because outfitter/guides will lead their clients to camp in areas where no cultural resource sites exist. Outfitter/guides can set a better example of where to camp in order to avoid cultural resource impacts.

At some point in the future, a camping permit system may be initiated for individuals who wish to camp in the WSA. If Congress designates the WSA into a "Wilderness Area", popularity could increase to the point where a camping permit system is needed for resource management. Furthermore, if the Whittier Road Access project becomes a reality, use may increase to the point where designated camping sites becomes a viable alternative for managing the area. This project GIS map provides a good data base if designating camping becomes a necessity in the future. The data base for the GIS map can also be used for carrying capacity studies.



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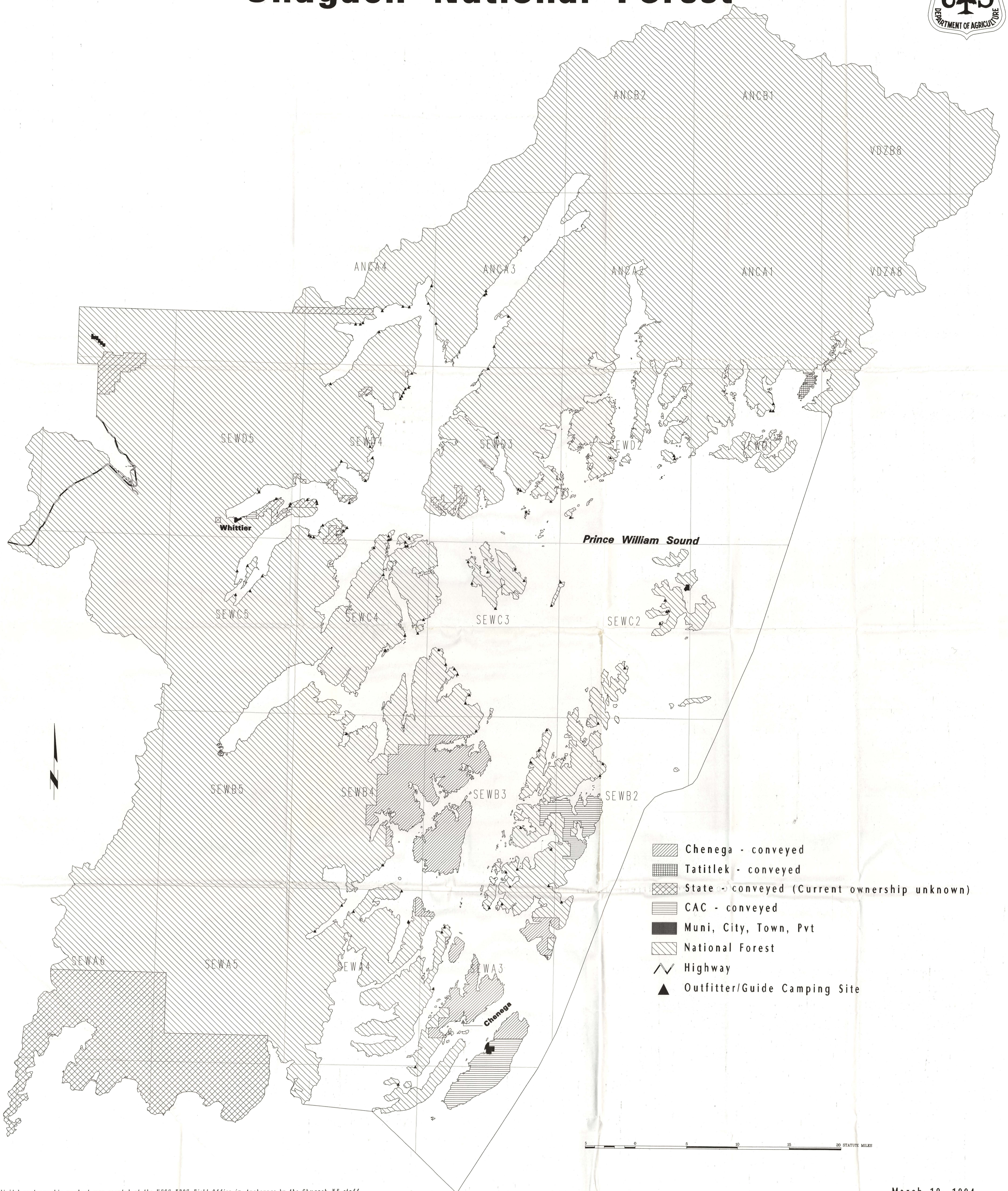
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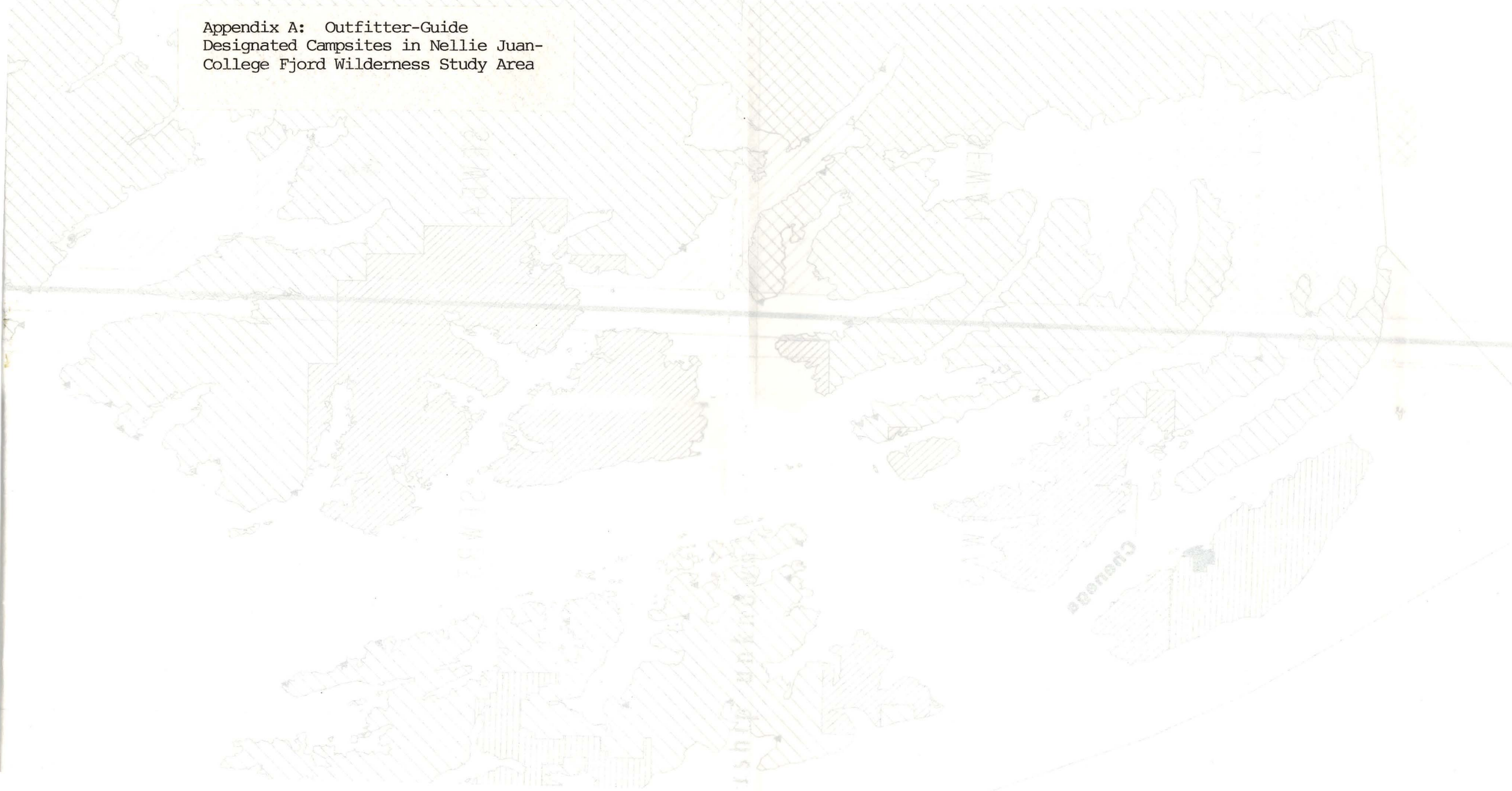
Outfitter/Guide Camping Sites

Glacier Ranger District

Chugach National Forest



Appendix A: Outfitter-Guide
Designated Campsites in Nellie Juan-
College Fjord Wilderness Study Area



LEAVE NO TRACE PRINCIPLES FOR
TEMPERATE COASTAL ZONES

1. PLAN AHEAD AND PREPARE
2. CONCENTRATE IMPACT ON ESTABLISHED SITES
3. SPREAD USE AND IMPACT IN PRISTINE AREAS
4. AVOID PLACES WHERE IMPACT IS JUST BEGINNING
5. PACK IT IN, PACK IT OUT
6. PROPERLY DISPOSE OF HUMAN WASTE
(CONSULT "LEAVE NO TRACE" HANDBOOK)
7. RESPECT WILDLIFE
8. LEAVE WHAT YOU FIND
9. USE FIRE RESPONSIBLY
BUILD FIRES ONLY WHEN NECESSARY AND
BELOW HIGH-TIDE LINE.

LAND OWNERSHIP
WHO TO CONTACT FOR PERMITS:

1. CHENEGA LANDS
CHENEGA CORPORATION
POST OFFICE BOX 60
CHENEGA BAY, ALASKA 99574
TELEPHONE: 907-573-5118
FAX.: 907-573-5135
2. CHUGACH ALASKA CORPORATION LANDS
CHUGACH ALASKA CORPORATION
560 EAST 34TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99503-4196
TELEPHONE: 907-563-8402
FAX.: 907-563-8402
3. TATITLEK CORPORATION LANDS
THE TATITLEK CORPORATION
POST OFFICE BOX 650
CORDOVA, ALASKA 99574
TELEPHONE: 907-424-3777
4. STATE OF ALASKA LANDS
DEPARTMENT OF NATURAL RESOURCES
POST OFFICE BOX 107005
ANCHORAGE, ALASKA 99510-7005
TELEPHONE: 907-561-2020
5. CHUGACH NATIONAL FOREST LANDS
GLACIER RANGER DISTRICT
P.O. BOX 129, GIRDWOOD, AK 99587
TELEPHONE: 907-783-3242 OR
CORDOVA RANGER DISTRICT
P.O. BOX 280, CORDOVA, AK 99574
TELEPHONE: 907-424-7661

SAFETY

1. WHEN HIKING NEAR HISTORICAL MINING AREAS
BEWARE OF HAZARDOUS WASTE, MINE SHAFTS
AND FALLING DEBRIS/STRUCTURES.
2. USE CAUTION WHEN KAYAKING NEAR THE
WEST SIDE OF WILLARD ISLAND IN BLACKSTONE
BAY. SUBMERGED MORaine AND STRONG WINDS
CREATE HAZARDOUS KAYAKING CONDITIONS.
3. CARRY A MARINE-BAND RADIO FOR EMERGENCY
SITUATIONS.
4. GLACIER FACES CALVE HUGE PIECES OF ICE
THAT CAN WEIGH SEVERAL TONS AND CREATE
SUDDEN, LARGE WAVES. PIECES OF FLOATING
ICE CAN ROLL OVER (ONLY 10% OF THE ICE BURG
IS EXPOSED ABOVE THE SURFACE). USE EXTREME
CAUTION WHEN BOATING NEAR ICEBURGS OR
GLACIERS.
5. TIDES FLUCTUATE APPROXIMATELY 20 FEET
EVERY 6 HOURS. BRING A TIDE BOOK AND KNOW
HOW TO USE IT.
6. BOTH BROWN AND BLACK BEARS LIVE IN PARTS
OF PRINCE WILLIAM SOUND. BE PREPARED TO
LIVE IN BEAR COUNTRY. STORE AND PREPARE
FOOD PROPERLY.
7. PRINCE WILLIAM SOUND'S COLD, WET WEATHER
IS THE PERFECT PRESCRIPTION FOR
HYPOTHERMIA. RAIN GEAR IS A MUST!

APPENDIX B

Project Meeting Notes 11/17/93

Present at Meeting: Elaine Gross, Project Facilitator
John Mattson, Chugach NF Archeologist
John Johnson, Chugach Alaska Corporation Archeologist
Don Ford, Nat'l Outdoor Leadership School Branch Leader
Paul Twardock, NOLS Instructor (late to meeting)

The purpose of the meeting was to talk about the implications of designating campsites in the Nellie-Juan, College Fjord Wilderness Study Area (WSA) in order to avoid ANCSA 14(h)(1) sites (historical & cemetery) and archeological sites. Campsites would be designated for Outfitter/Guide use, not general public use.

John Johnson stated that all 14(h)(1) sites should be protected until actually conveyed. These sites should be protected whether they are determined eligible for conveyance or not. Several 14(h)(1) sites have been determined ineligible or questionable for conveyance. Mr. Mattson and Mr. Johnson agreed that approximately 100 sites exist in the WSA and approximately 300 in the Prince William Sound Area. Elaine will determine numbers and locations of sites when she does more research for the project.

We discussed the buffer zone that surrounds 14(h)(1) sites. Per 43 CFR 2653.5 (2)(m): the zone is no more than 330' around historic sites and 66' around cemetery sites. John Johnson and John Mattson believe that 66' is too small for the buffer zone around cemetery sites. Active cemetery sites have a buffer of not more than 10 acres unless special circumstances warrant a greater buffer zone (per CFR 2653.5(m)).

John Johnson gave an example of many private users beach combing and taking artifacts from the XXXX site.

Chugach Alaska Corporation (CAC) may be interested in joint management of 14H1 sites. After a site is inventoried and surface collected, the site could be interpreted.

Confidentiality of 14(h)(1) and archeological sites is a major problem. Mr. Johnson stated that Exxon and CAC are involved in a court case right now involving sites, the oil spill and confidentiality.

We discussed Forest Service management and using the National Outdoor Leadership School (NOLS) as possible stewards of the WSA.

Don Ford talked about Leave No Trace (LNT) camping and education. NOLS has approximately 3,600 person-days per season in the WSA. Several more sea kayak, hunting and hiking/skiing outfitter guides will be permitted this summer (per Elaine).

John Johnson has noticed a lot of theft of artifacts at several of the sites. He talked about the XXXX site development and how kayakers will be able to use XXXX on an organized tour route in the future.

Everyone agreed that public education at points of entry to Prince William Sound (Whittier, Valdez & Cordova) is very important, along with the threat of law enforcement as a deterrent. The sensitivity of all sites varies.

Tent Platforms - NOLS would not care to use them. Don Ford said that the only place where tent platforms may be appropriate are areas of massive use, like certain locations in Passage Canal. John Johnson said that a gravelled pad would be preferred. Don Ford said that NOLS only camps on the beaches because that gives the least impact to an area. Elaine stated that private users and outfitter/guides need a detailed map of where they can camp. Mr. Ford would like to see something in the middle between detailed maps/designated sites and providing no information at all. He gave Gates of the Arctic National Park as an example. They manage their area by providing only general information so that the visitor has a sense of discovery.

Surface collection of artifacts would contribute to clearance of sites for future use.

Don talked about projected use of PWS. Department of Transportation supplied the following figures. There were 200,000 visitor days in 1992. If the road to Whittier is built, projected use is 1.9 million in 1997. We need to be prepared for that type of increase in visitation to PWS. Maybe designating campsites now is important.

John Johnson said there should be a case-by-case evaluation for determining boundaries around sites. Elaine has maps of NOLS campsites and GIS maps of 14(h)(1) Sites. She will work closely with Mr. Johnson in determining where campsites should be emphasized that avoid 14(h)(1) sites. Currently, Alaska Wilderness, Recreation and Tourism is developing a guide for recreation use (Elaine will work with them to eliminate duplication).

The XXXX site has been so impacted from Outfitter/Guide and private use, it is John Johnson's opinion that O/G's could use a nearby beach and not XXXX. NOLS consciously moves away from camping at high use areas. Upon conveyance, XXXX could be developed as an interpretive site. Emergency shelters could be placed at known locations to avoid use at sites like XXXX.

NOLS: Tries not to visit the same place twice in the same season. NOLS has developed a feeling for lessening impacts through intentionally dispersing the use. John Johnson asked Don Ford what Chenega charges for use of their land for camp. Chenega charges \$1,000.00 base and \$1.90 per person per day. John stated that CAC also has land that NOLS and other outfitters can use, and the fee might be less than charged by Chenega. John Johnson asked about insurance for O/G's and Elaine stated that all O/G's must carry insurance that is approved by the Forest Service. Don Ford said it is impossible to pre-determine camping areas because the weather is always changing. It would not work to designate campsites for particular dates.

292 archeological sites within the WSA are shown on a GIS layer (highly confidential information).

GIS camping site mylar was overlayed on the GIS archeological site map. Any camping sites that were located too closely to archeological sites were removed from the GIS map.

Approximately 130 camping sites are currently listed on the map given to outfitter/guides.

Archeological Site Protection:

Chugach National Forest Archeologist John Mattson spoke about archeological site protection. Chugach Alaska Corporation Archeologist John Johnson was unable to attend.

The National Historic Preservation Act requires impact analysis and permitting. This is an area of concern -- outfitter/guides can help sensitize clients to artifacts and then report back to the Forest Service. Currently, knowledge of archeological sites is restricted.

State of Alaska manages the land below mean-high tide. State policy is to "leave as found". All historical/archeological resources found in this zone are managed by the State.

If artifacts are found, at a minimum, sketch or photograph them, and pass information on to the District Ranger (Glacier Ranger District phone number is 783-3242). There is a concern for small, portable artifacts made of greywackie or greenstone (such as grinding stones, tools of bone or teeth, pecking stones and blades).

The Forest Service policy is to "leave them in place" and report with photos and maps.

There is on-going erosion of archeological sites: since the 1964 earthquake, some formerly uplifted sites have dropped and are being eroded by the ocean. Burial caves, rock structures and occupation camps are located on uplands. Several accessible sites have already been vandalized. Some sites are exposed to waves and more artifacts are washed out yearly.

Sites near fish streams have a higher likelihood of having caves and artifacts in the area. There are some pictographs in the WSA - many are eroding away. Human remains have the greatest level of protection from the Native Corporations and the Federal Government, and carry the highest level of prosecution if remains are disturbed.

The following is prohibited: No person may

- Excavate
- Alter/deface
- Remove
- Damage

Unless permitted.

Whenever mineral soil is disturbed, artifacts/sites may be disturbed. If less than 1 square meter is disturbed, this is permitted by the Forest Service. **Stop** disturbing mineral soil if artifacts are found. Report **immediately** to the District Ranger (783-3242). Particularly important not to disturb is bone.

Bone disturbance is a very real possibility because Chugach Eskimos buried their dead in midden piles. There are stiff penalties for disturbance - fines and prison sentences.

Currently, the Bureau of Indian Affairs (BIA) is examining and reevaluating archeological sites. The Forest Service assists and responds to BIA evaluation. This process will continue indefinitely. Within the WSA, there are 300+ sites. Less than 25% of the sites that go through the BIA evaluation process will be contested by the Forest Service. Once a site is found eligible for the National Register of Historic Places, the site will be conveyed to the appropriate Native Corporation (in this case, Chugach Alaska Corporation).

Questions, Issues, & Concerns Raised by Outfitter/Guides:

Paul Twardock raised the concern that the general public will be allowed to use and abuse sites the outfitter/guides are restricted from.

Response: That is a concern of the Forest Service also. Because outfitter/guides must have a Special Use Permit to outfit or guide on the National Forest, it is currently easier to regulate the outfitter/guide. Also, the outfitter/guide sets the example of where to camp (especially for future private kayakers who take first-time trips with outfitter/guides). Since the WSA is a "study area" and not a designated Wilderness, there is no money within the Forest Service budget to regulate the private user or administer a camping permit system for the private user. This may change in the future so that all users in the WSA are required to camp in designated sites.

Paul Thardock said there were not enough designated campsites located in the southern end of the WSA. An appointment was set up with Elaine Gross so that more designated sites could be added to the GIS map that was given to all present at the meeting. As a result of Paul's meeting with Elaine, sixty sites will be added to the GIS map (a revised copy of the GIS map will be mailed out later this season).

Conclusion:

Elaine Gross stressed that the GIS map is very fluid. In other words, the "designated" camping sites will change and grow over time. She will be working very closely with NOLS (since NOLS uses the WSA much more than any other outfitter/guide) to make sure designated sites are appropriate.

John Johnson stated that CAC would like to partner with NOLS in providing increased recreation opportunities for the sea kayaker. Safety options would also be met if there are more locations for camping.

Don Ford talked about being broad-based. In NOLS classes, all sorts of information is provided to the kayaker, including LNT principles, avoidance of archeological sites, navigation, weather, safety and hazard analysis. If a group is already using a campsite, NOLS always selects another site. O/G's must also be sensitive to sea lions, eagles, subsistence use and pupping areas.

Elaine Gross talked about Carrying Capacity and Limits of Acceptable Change studies.

There is a need to develop a brochure and incorporate wording in Special Use Permits that govern visitation to ANCSA 14 (h)(1) sites.

John Johnson is OK with sensitizing the NOLS staff to Cultural Resources. Elaine mentioned the possibility of having a 1-2 day meeting with all O/G's about LNT camping principles and sensitivity to Cultural Resources.

One of the products Elaine would like to have for this project is a thorough map that shows all camping beaches (all beaches would avoid 14(h)(1) sites). LNT camping principles could be listed on the reverse side of the map.

Paul Twardock came to the meeting after John Johnson and John Mattson had left. Paul had some concerns regarding a map that would show all of the camping beaches in the WSA. One concern was liability: Would the Government want the liability of listing places to camp and having the public sue if something went wrong...like an earthquake, high-high tide, etc.? Furthermore, if campsites are noted on a map, more use will occur. Paul has been approached several times to write a book on camping in PWS. He has refused because of the increased use such a book would invite. Paul believes that people should be taught how to camp in the WSA, not where to camp. Education is very important.

Susan Rutherford also joined the tail end of the meeting. It was stressed that the information Elaine is gathering for the project will help in future land management decisions. Products such as maps will have to be decided upon. Sensitivity to creating more use in PWS by providing a map will be taken into consideration.

Meeting notes sent to: John Johnson, Chugach Alaska Corporation
John Mattson, Chugach NF Archeologist
Don Ford, Director, NOLS Alaska
Paul Twardock, Instructor NOLS
Judith Bittner, State Historic Preservation Officer
Susan Rutherford, Recreation Staff Officer, Chugach NF
John Dorio, District Ranger, Glacier Ranger District
Alison Rein, Asst. District Ranger, Glacier R.D.

APPENDIX C

HERITAGE RESOURCES REPORT

ON

THE EXISTING AND PROPOSED CAMPING SITES

IDENTIFIED BY THE NATIONAL OUTDOOR LEADERSHIP SCHOOL (NOLS)

BY

JOHN L. MATTSON

FOREST ARCHEOLOGIST

MAY 7, 1993

SUPERVISOR'S OFFICE

CHUGACH NATIONAL FOREST

201 EAST 9TH AVENUE

ANCHORAGE, ALASKA

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I. BACKGROUND

Kayaking in Prince William Sound probably began with its Native inhabitants, the Chugach Eskimo, or Aleuts as they prefer to call themselves today. No firm date is known for their entry into the Sound but the Kayak probably served them as well at that time as it did when the first European explorers came along (Birket-Smith, 1953; Laguna, 1956). It was a craft used primarily for travel and subsistence pursuits. Today, it is used primarily as a travel mode for recreation. The criteria for campsite locations for today's kayaker are likely to be similar to those of the original inhabitants; a good beach in a protected setting with fresh water and food resources. Notwithstanding the vagaries of catastrophic change in land/sea relationships over the millenia in the Sound (Plafker, 1965), many Native kayak camps survive as archeological sites. The majority of these have been selected for ownership by Chugach Alaska Corporation (CAC) under the terms of Section 14(h)(1) of the Alaska Native Claims Settlement Act (ANCSA) of 1971 (as amended). Evaluation and reevaluation of these selections is still in progress by archeologists of the ANCSA office of the Bureau of Indian Affairs (BIA). None have yet been adjudicated or conveyed by the Bureau of Land Management (BLM) but the current state of evaluations indicates this action is likely in the near future.

Those ANCSA 14(h)(1) sites which have been evaluated by BIA archeologists and have been issued a certificate of eligibility for conveyance are considered to be likely eligible for the National Register of Historic Places (NRHP) and must be managed as such. The same holds true for archeological sites discovered during the Exxon Valdez Oil Spill (EVOS) (Exxon, 1990-93) cleanup effort that may underlie some of the existing or proposed NOLS camp sites. Under the terms of the Cultural Resources Memorandum of Agreement (MOA) (Exxon, 1990) signed by parties to the cleanup effort, all cultural resources discovered during the effort are considered eligible for the NRHP until demonstrated otherwise. That MOA is in affect at this time but is considered to have a short life expectancy. The agreement terminates with the Coast Guard's Federal On Scene Coordinator's declaration that the cleanup effort is completed. During the interim (until conveyance or termination of the MOA) the Forest Service is responsible for protecting these sites under the provisions of the National Historic Preservation Act (NHPA), 36CFR800 and the Archeological Resources Protection Act (ARPA), 36CFR296.

While NOLS is well known for its philosophy of "no impact camping" with little or no disturbance of the subsurface estate, the anticipated cumulative affect of increased site usage by NOLS and others cannot help but have some negative impacts over time, particularly on archeological resources. This anticipated increased use upon National Register eligible properties must be taken into consideration.

II. CURRENT SITUATION

A. Land Status: The land base of the Chugach National Forest (CNF) in Prince William Sound is still unsettled with land selections by the State, Native and Village Corporations yet to be resolved. The NOLS campsite locations were cross referenced with Engineering and Land's "Chugach National Forest Ownership Showing Overselected Lands" map created by the CNF and current as of December 11, 1992. The land status of the NOLS camp sites, as described in the appendix, is based upon the above referenced map.

B. Heritage Resources Inventory Status: The Heritage Resource (formerly Cultural Resources) inventory of the CNF is still in the pioneer stage of development. Base line surveys were first conducted by Frederica de Laguna in the early 1930s (Laguna, 1957). Subsequently, two surveys were conducted (Brown, 1975; Lobdell, 1976) in support of timber harvest activities. In the mid 1970s Douglas Reger, presently with the state office of historic preservation, became the first archeologist retained by the Forest Service in Region 10 and conducted a similar number of surveys as did Gerald Clark, his successor and current Regional Archeologist (Reger, 1975; Clark, 1976). Both individuals conducted their surveys from the Regional Office in Juneau prior to the advent of a Forest archeologist. The regional policy for conducting Heritage Resource inventories was in affect when an archeologist was retained for the CNF in 1977. This policy specified that the Heritage Inventory would be accomplished exclusively through project clearance activity; a policy that remains in affect to this date. More recent inventory work has been accomplished through continuing project clearance activity, location and evaluation of ANCSA 14(h)(1) sites by the BIA and Cooperative Park Studies Unit of the National Park Service (NPS) (BIA Reports, 1970s, 80, and 90s) and surveys conducted as part of the Exxon Valdez oil spill cleanup effort. To date there has been no effort or plan to conduct comprehensive field inventories of the Heritage Resources on the Chugach National Forest.

C. High Probability Zone: The high probability zone for the occurrence of heritage resources on the CNF until the oil spill in Prince William Sound was from sea level to the 100 foot contour interval. Coastal archeological surveys accomplished during the spill cleanup effort clearly proved that such resources extended well out into the intertidal zone, and beyond. Fossil beach terraces at elevations exceeding the 100 foot contour interval and the 30+ foot rise in elevation of the southern end of Montague Island following the 1964 earthquake prompted a reconsideration of the parameters of the predictability model. It is now believed that the high probability zone for heritage resources should extend from 50 feet below sea level to the 150 foot contour interval above it. All NOLS campsites fall within this zone of high probability (Mattson et. al. 1987).

D. Consideration of Cumulative Affects: The question will probably arise, "how can just foot traffic have an affect on subsurface heritage resources"? The best example on the Chugach National Forest may be observed at the Russian River Campground area on the Kenai River. In both places, riverine and maritime,

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sensitive archeological resources are located immediately adjacent to water bodies (Kenai and Russian rivers and Prince William Sound) and inland away from them. In the campground area, the river banks have been denuded of vegetation, compacted in non-cultural feature areas and greatly loosened in the cultural feature areas. Both situations have contributed, cumulatively over time, to the destabilization of the river banks and their subsequent erosion. This erosion is continuing to destroy cultural features. In the campground proper, foot traffic on a trail across a shallow human burial crushed the skull and probably dislocated and dispersed the remaining skeletal parts and associated grave goods that remain, if any. With increased visitation to archeological sites in Prince William Sound, similar impacts to similar resources may be anticipated.)

E. Native Concerns for ANCSA 14(h)(1) Sites and Conveyances: The historic and cemetery sites selected under section 14(h)(1) of the ANCSA by Chugach Alaska Corporation are of great concern to both the Natives of Prince William Sound and their organizations and the Forest Service. The Native concern stems primarily from the knowledge that the archeological sites contain the only remaining record of the life ways of their ancestors prior to written history and the cemeteries contain the remains of those who actually lived those life ways. The Forest Service appreciates these same sites for the same reasons but with the official responsibility to inventory, evaluate them for the National Register, protect and enhance them. The first two requirements have already been partially fulfilled for the Forest Service by the Bureau of Indian Affairs and the Cooperative Park Studies Unit under the requirements of ANCSA. Many more sites have been discovered since the closing of the ANCSA selection time window and in which they maintain great interest. Until they are conveyed out of Federal ownership, the Forest Service must protect them. One method of protection may be to prohibit their use by organized recreationists who require a Special Use Permit to use Forest Service lands. How these sites may be enhanced, if at all, will be addressed in the provisions of the covenants riding with the titles of the conveyed sites. Interpretation of the sites (a form of enhancement) during the interim until conveyance, has met with strong disapproval by the Native community on the grounds that it identifies the sites for vandalism. The Chugach National Forest does not have an operating budget capable of retaining sufficient law enforcement personnel to meet the level of protection required of these sites if they were to be openly identified and interpreted. It is therefore likely that the sites will not be enhanced or interpreted during the interim.

III. FINDINGS

Based upon the foregoing discussions and additional data shown in the appendix it appears as if the following condensed findings apply to this undertaking.

1. NOLS has utilized and identified for future use certain campsites along the shoreline in PWS as shown on the maps contained in the appendix.
2. Many of these campsites are situated upon identified ANCSA 14(h)(1) sites or other archeological sites determined likely eligible for the National Register of Historic Places.
3. The Cultural Resource Manager of Chugach Alaska Corporation has requested that this, and similar activity be prohibited from some of these sites.
4. Until the ANCSA 14(h)(1) sites have been conveyed out of the public domain, the Forest Service has the responsibility to protect them as well as all other identified cultural resources.
5. Increased recreational use of these sites over time will likely have a cumulative "Adverse Effect" upon them, even if the short term use may be construed as having little or no subsurface impacts.
6. The Chugach National Forest doesn't have the budget level available to provide sufficient numbers of law enforcement personnel to adequately protect these sites.
7. Curtailing or restricting use of these sites by the organized recreating public is a form of protection.

IV. RECOMMENDATIONS

I Recommend that the following action be taken on the listed existing or proposed NOLS campsites which are congruent with ANCSA 14(h)(1) sites determined eligible for conveyance.

1. Recommendation Alternative #5: Notify NOLS that they may no longer use this particular site but may identify another in the vicinity for potential use, subject Forest review and approval. This recommendation applies to the following maps and sites listed in the appendix.

Map #1: Sites ~~4~~ and ~~6~~; Map #2: Sites ~~3~~, ~~4~~, ~~6~~ and 15; Map #3: Site 1; Map #4: Sites 2 and 28, Map #6: Sites 2 and 6.

2. Recommendation Alternative #4: Notify NOLS that they may continue to use the site under the current restrictions until an archeological survey on it can be conducted as part of a phased survey of all NOLS camp sites over the next 3 year period. This recommendation applies to all other maps and sites listed in the appendix, exclusive of those listed under item 1. above.

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Chugach National Forest

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VI. APPENDIX

NOLS CAMP SITES MAPS AND MAP DATA CHARTS

GIVENS:

1. All proposed and existing NOLS camping sites lie within the High Probability Zone [below the 150 foot contour interval on land and above the minus 50 foot mean high tide line (50 feet below sea level)] for Heritage Resources.
2. With the exception of the northern most areas of NOLS Map #1, all coast lines of the NOLS maps were surveyed for Heritage Resources during the EXXON VALDEZ Oil Spill Cleanup Effort.
3. The presence of an ANCSA 14(h)(1) site is evidence of a BIA survey.
4. Each NOLS map data will be recorded on a separate page or pages.
5. The CONCERN level for all NOLS sites is high (see III. FINDINGS).
6. Notify CAC of all decisions regarding NOLS camps on their ANCSA selections.
7. The recommended alternative is based upon considerations discussed in III. FINDINGS.

ABBREVIATIONS:

SITE NO. = Site Number

INVENTORY STATUS:

NO = No Survey

F.S. = Forest Service Survey (either in-house or by contract)

YES = ANCSA of Oil Spill Survey

LAND STATUS:

STATE = State of Alaska lands

C.V. = Chenega Village Lands

F.S. = Forest Service Lands

V.O.S. = Chenega Village Over Selected Lands

S.S. - State Selected Lands

RECOMMENDATION ALTERNATIVES:

1. - Do nothing
 2. - Allow continued use of site under current restrictions until an archeological survey of the site can be conducted.
 3. - Alternative #2 plus, conduct an archeological survey immediately
 4. - Alternative #2 plus, conduct an archeological survey as part of a phased survey of all NOLS camp sites over the next 3 years.
- 8
5. - Notify NOLS that they may no longer use this particular site but may identify another in the vicinity for potential use, subject to Forest review and approval.
 6. - Notify NOLS that because of the Heritage sensitivity of the site, their use of it will be phased out over a 3 year period, recommend they identify an alternate site in the vicinity for consideration. Recommendation of ALTERNATIVE 7 will continue to apply during phase out.
 7. - Discretely post appropriate signs, advise NOLS leadership of the sensitive nature of their camping site, restrict the use of fire and subsurface ground impacting activities, and conduct a full compliance study per Section 106 of the National Historic Preservation Act and 36 CFR 800.



United States
Department of
Agriculture

Forest
Service

Chugach
National
Forest

Glacier R. D.
P.O. Box 129
Girdwood, Ak 99587

Reply To: 2720

Date: July 8, 1993

Judith E. Bittner
State Historic Preservation Officer
Department of Natural Resources
P.O. Box 107001
Anchorage, AK 99510-7001

Dear Ms. Bittner:

Thank you for your evaluation of AHRS sites located within one mile of the NOLS campsites. We have amended the NOLS permit to state that camping is not permitted at any of the locations included in your evaluation. A copy of the amendment is enclosed for your reference. In order to issue NOLS a special use permit before their season began, we limited their camping activities to areas recommended by Forest Archeologist John Mattson. Amendment #1 further limits their camping.

Again, thank you for your prompt response. If you have any further concerns or questions, please contact Elaine Gross at 783-3242. We look forward to working with you in the future.

Sincerely,

JOHN C. DORIO
District Ranger

Enclosures 2

cc: J.Mattson:SO
Lands:SO



STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF PARKS AND OUTDOOR RECREATION
Historic Sites Advisory Committee

WALTER J. HICKEL, GOVERNOR

3601 C STREET, Suite 1278
ANCHORAGE, ALASKA 99503
PHONE: (907) 762-2622

MAILING ADDRESS:
P.O. Box 107001
ANCHORAGE, ALASKA 99510-7001

June 16, 1993

File No.: 3130-1R USFS

Subject: National Outdoor Leadership School SUP

Mr. Bruce Van Zee, Forest Supervisor
Chugach National Forest
201 E. 9th Ave., Suite 206
Anchorage, AK 99501

ATTN: John Mattson

Dear Mr. Zee;

Enclosed are the 18 USGS maps you sent showing the locations of National Outdoor Leadership School (NOLS) camp sites. My staff has marked on them the locations of known AHRS sites within roughly one mile of the NOLS camps.

You will note that there are a number of instances where NOLS camps are on or very near historic properties. Some examples are as follows:

Map sheet SEW A2
SEW A4
SEW B2
SEW B3
SEW B4
SEW C2
SEW C3
SEW C4
SEW D1
SEW D2
SEW D3
SEW D4

NOLS camp #2

S. End
#7 N. 6
#1 E. Side
#1, #7, #10
#3, #4 N. S. J.
#1 NE PT of
#2, #7 PT. W. side
#6 S. End
#1 Pt.
#2 Island West of
#2, #3, #7 N. End.
#7 Head of Bay

Visiting sites for educational purposes is encouraged but we are somewhat concerned about repeated camping on archaeological sites. While the impacts are probably limited and largely inadvertent in nature, it seems that the Forest Service is better off not allowing camping on known sites when alternative locations are available. At minimum, guides should be cautioned about collecting surface artifacts and not allowed to dig slit trenches on known

archaeological sites.

Also of concern is the issuance of the Decision Notice and FONSI on May 24, only four days after we received your request for site locations. The FONSI states that "(t)he action would not adversely affect cultural resources, or objects listed, or eligible for listing, in the National Register of Historic Places." This may ultimately prove to be true, but it is premature to say so before the Forest Service even knew of the site locations. Further, the National Register eligibility of few of the sites has been determined. In short, the FONSI was issued while the Section 106 consultation had barely been initiated.

It appears that the Forest Service will be issuing NOLS a Special Use Permit on an annual basis. We propose that a set of standard conditions be developed that can be attached to the permit each year and look forward to further consultation on the issue. Please call Tim Smith at 762-2625 if there are any questions or if we can be of further assistance.

Sincerely,

A handwritten signature in cursive script, reading "Judith E. Bittner".

Judith E. Bittner
State Historic Preservation Officer

JEB:tas

Enclosures

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SAMUEL J. FORTIER
DAGMAR C. MIKKO
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JOHN L. HOFFER, JR.**

*Also admitted in Wyoming
**Also admitted in Washington

April 12, 1993

APR 13 1993

John C. Dorio
District Ranger
Glacier Ranger District
P.O. Box 129
Girdwood, AK 99587

Re: Western Prince William Sound Outfitter Guide Activities
Our File No. 204-2

Dear Ladies and Gentlemen:

We represent Chenega Corporation. We respond to the proposed EA for Western Prince William Sound Outfitter Guide (O/G) activities. Our comments are divided into two topics: (1) prevention of impact to archaeological/historical sites; and, (2) protection of subsistence and private property interests.

1. Impact to Archaeological/Historical Sites.

Enclosure 2 contains language for clauses included in all outfitter guide special use permits, apparently at a citation referred to in the enclosure as "RX-17." The clause appears to be outdated, and not in conformity with the 1988 Amendments to the Archaeological Resources Protection Act (ARPA) of 1978. 16 U.S.C. § 470EE(a) now prohibits actual excavation as well as any attempts to excavate archaeological, historical, or paleontological resources. See Pub. L. 100-588. See also 1988 U.S. Code Cong. & Admin. News 3983.

In contrast, the cited clause appears to be geared only towards actual excavation, and not attempts. There is no reason why either outfitters or guides should be permitted to excavate or otherwise be permitted to undertake ground disturbing activities. Contrast RX-17, at Enclosure 2. In addition, the clause would appear to us to shift the risk of disturbance to the holder of the permit, in violation of the Forest Service's responsibilities pursuant to ARPA.

Further, the Forest Service, by now, is certainly aware of numerous archaeological and historical sites on its lands in Western Prince William Sound, given the tremendous exposure following the Exxon

Glacier Ranger District
April 12, 1993
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Valdez oil spill, Chugach Alaska Corporation's ANCSA § 14(h)(1) Report, and information supplied by Chenega Corporation.

In short, language within the special clause which appears to permit excavation or other ground disturbing activity should be deleted in favor of a complete prohibition. Further, the holder should not be permitted to perform salvage of discovered resources, as RX-17 appears to anticipate.

Finally, the clause should also contain a specific prohibition against such activity on "Indian lands" which are defined at 16 U.S.C. § 470BB(4) as "subject to a restriction against alienation imposed by the United States..." See also 16 U.S.C. § 470cc(c) (requiring notice to "any Indian tribe" prior to issuance of a permit). An Indian tribe is defined as a "regional or village corporation as defined in, or established pursuant to, the Alaska Native Claims Settlement Act." 16 U.S.C. § 470BB(5).

2. Subsistence and Trespass Issues.

The special use clause refers to subsistence and local residents. See Enclosure 2, citing to "D-24." Pursuant to § 804 of ANILCA, 16 U.S.C. § 3114, "customary and direct dependance on the population as the main stay of livelihood ...", is the highest priority. See 16 U.S.C. § 3114. The point is, we do not believe that you have adequately considered what effects the proposed actions will have on subsistence uses and needs, as required pursuant to 16 U.S.C. § 3120(a). To our knowledge, there has been no public hearing, as required pursuant to § 810 of ANILCA.

Due to the Exxon Valdez oil spill and its aftermath, pressure for subsistence natural resources in unpolluted areas in the Western Sound is intense. There is an increasing public use of Forest Service lands adjacent to Chenega Corporation lands, which appears to have caused an increase in trespass activities on Chenega Corporation lands. Chenega Corporation lands which are utilized by its shareholders for subsistence purposes, do remain polluted with EVOS oil. The outfitter/guide permitting scheme without direct involvement by Chenega Corporation as an enjoining land owner, only increases the pressure on the village corporation.

Further, we note that the clause relating to Native selections, RX-98, appears to be significantly outdated, in that it refers to selections, but does not in any way relate to jurisdictional boundaries between Forest Service and private lands in the Western Prince William Sound area. We have earlier supplied you with notices. We are attaching another copy of the notice which has

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April 12, 1993
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been published in the Sports Fishing Regulations for the State of Alaska. We do request that a copy of the notice be appended, as a special clause, with regard to any permits issued for Western Prince William Sound. We further request that you give serious consideration to the need to hold hearings with regard to the proposed action, as required by ANILCA, in the affected area of Chenega Bay.

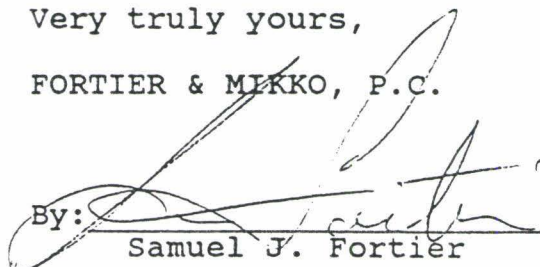
3. Summary of Other Comments.

Because of the extremely compressed schedule in which to respond, we will list our concluding comments, briefly. They are:

- a. Party sizes should be limited.
- b. The Forest Service must address litter/garbage/human waste problems.
- c. No trace practices are needed.
- d. There is a need for a carrying capacity study.

Very truly yours,

FORTIER & MEKKO, P.C.

By: 
Samuel J. Fortier

SJF:jet

cc: Charles W. Totemoff
Gail Evanoff

j:\Chenega\4-12glac.ltr

THE TATITLEK CORPORATION

P.O. Box 650. Cordova, Alaska 99574 • Phone (907) 424-3777

April 2, 1993


Mr. John Dorio
U.S.D.A. Forest Service
Glacier Ranger District
P.O. Box 129
Girdwood, Alaska 99587

Dear John,

As you know, The Tatitlek Corporation expects to receive conveyance to certain parcels bordered by Heather Bay, Columbia Bay, Emerald Cove, and Sawmill Bay in 1993. I would appreciate being informed of any requests you have for outfitter/guide permits for these areas. Also, I am asking that any permits involving these parcels be denied.

Thank you for working with us on this matter.

Sincerely,



Mary A. Gordaoff
President, Board of Directors
THE TATITLEK CORPORATION

REF 93-049
MAG/mlc

RECREATION, TOURISM, CULTURAL, AND SCENIC RESOURCES

Goals

Recreation Opportunities. Alaska's residents and increasing numbers of out-of-state visitors desire and expect a variety of accessible outdoor recreational opportunities. Areas with unmodified natural landscapes, conveniently located public recreation areas; well designed, maintained, and safe recreation facilities; and opportunities to appreciate Alaska's history and diverse cultures should be provided to aid the physical and mental health of a highly competitive society:

- Develop a system of parks, recreation areas, trails, historic parks, rivers, and areas of unchanged scenic landscape that provide a wide range of year-round outdoor recreation opportunities for all ages, abilities, and use preferences near population centers and major travel routes. Foster cooperation with other agencies, nonprofit groups and landowners in the management of the state park system and other state lands and tidelands for recreation.
- Provide recreation opportunities on land and water areas that serve multiple purposes such as habitat protection, timber management, and mineral resource extraction.
- Assist communities through cooperative planning, conveyance of state lands, and grants-in-aid for parks and trails within population centers.
- Encourage commercial development of recreational facilities and services through concession contracts, land sales, leases, loans and technical assistance where

public recreation needs can most effectively be provided by private enterprise while minimizing environmental impacts.

Recreation Resource Protection. Alaska's natural and cultural resources are the foundation of Alaska outdoor recreation and they must be protected. Soil, forests, prehistoric and historic sites and objects, fish and wildlife habitat, scenic areas, and access to open space must be preserved if Alaska's scenic and recreation values are to be maintained for future generations. Long-term public appreciation of Alaska's natural and human history and perpetuation of Alaska's distinctive identity can be accomplished through the following actions:

- Protect the recreation resources that the public comes to see and use including public access, visual resources, and, where appropriate, the isolation and unique wilderness characteristics of Prince William Sound.
- Protect and portray natural features of regional or statewide significance and cultural features representative of major themes of Alaska history in historic sites, parks, and preserves of the State Park System.
- Assist other land management agencies and nonprofit groups to perpetuate natural and historic features on non-state lands, in community park systems, and on private property by providing technical assistance and grants-in-aid.

Economic Development. Prince William Sound is an international tourist attraction. Tourism has grown dramatically since

statehood and is now the state's third largest industry; its economic potential has just begun to be realized. Areas developed and managed primarily for outdoor recreation and the appreciation of scenic and historic values fulfill expectations of tourists. One-sixth of Alaska's summer out-of-state visitors come to Prince William Sound. The influx of tourism dollars creates many jobs and services for Alaska residents. Recreation and tourism employment can be increased by doing the following.

- Rehabilitate and maintain recreation resources that enable greater appreciation of Alaska's natural, scenic, and historic resources.
- Increase the number of attractions through additions to the Alaska State Park System and the management of other state lands to protect natural, scenic, recreation, and historic resources.
- Develop cooperative interagency information centers for visitors.
- Maintain viable wildlife populations.
- Assure adequate opportunities for the full spectrum of developed and undeveloped recreation opportunities appropriate for Prince William Sound. Opportunities should be available in appropriate areas at a reasonable price. This goal should be achieved considering the use and plans of all land owners: private, federal, and state.

Cultural Resources. The Alaska Historic Preservation Act establishes the state's basic goal which is to preserve, protect, and interpret the historic, prehistoric, and archaeological resources of Alaska.

Management Guidelines

A. Coordination With Other Landowners. Recreation management, including the location and management of recreation facilities, will take into account the current and likely

management by the USFS and private landowners, so as not to unnecessarily duplicate facilities and to provide areas where facilities do not exist.

B. Public Recreation Facilities

1. Public Use Cabins. A system of public use cabins should be established in state parks and other state lands. The department will develop administrative procedures for managing a state public use cabins program, set priorities for cabin sites, and seek a budget for construction, maintenance and program management. Cooperation will be sought with municipal or federal governments or nonprofit organizations for construction and management of cabins. The locations will be consistent with the management intent and guidelines of the plan.

2. Location of Recreation Facilities

a. Preferred Locations. Recreation facilities, including public use cabins, minimum development campsites, mooring buoys and other low intensity facilities are needed in these situations: 1) when over-use is damaging the environment; 2) to direct public use and activities away from inappropriate areas; 3) to accommodate conflicting uses; and 4) to encourage additional public use by expanding the campsites or anchorage capacity consistent with the plan's management intent.

b. Inappropriate Locations. Recreation facilities are not appropriate where the management intent is to maintain the natural condition of the area free from additional concentration of recreation users or significant evidence of human use. Unless the management intent indicates otherwise, tidelands adjacent to proposed USFS wilderness areas are a part of this category.

3. Design Recommendations

a. *Public Use Cabins.* Public use cabins will be located to maintain scenic values and avoid or minimize conflicts with other important resources including frequently used travel routes, anchorages, and campsites.

b. *Mooring Buoys.* Mooring buoys will not be located: (1) in existing natural anchorages, unless they would increase the capacity or reliability of the anchorage (for example, make it reliable in different wind or wave conditions); (2) adjacent to frequently used campsites, unless intended as a part of the campsite development; (3) where they may interfere with commercial fishermen including drift net, purse seine, or set net operations; (4) in areas that will conflict with state or federal wilderness management objectives; or (5) in or adjacent to sensitive habitats, such as eelgrass beds, unless they will help preserve the habitat by minimizing the use of anchors.

C. Commercial Recreation Facilities on State Land. Lodges (including floating lodges), tent camps, or other private facilities designed to be run as private recreation facilities may be authorized if the facility meets the management intent and guidelines outlined in Chapter 3, it fulfills the conditions outlined in this guideline and it is in the public interest as determined through a written finding by the land manager or a management plan prepared in accordance with AS 41.21.302(c). In addition, Chapter 3 prohibits commercial recreation facilities in certain areas.

Floating commercial recreation facilities must also meet the Planning and Coordination guidelines on page 2-2. In implementing those guidelines, the land manager should give special consideration to the concerns of the upland owner through the process out-

lined in guideline A, *Upland Owner Participation*, page 2-2.

1. Recreation Opportunities. Commercial recreation development adds to or enhances available recreation opportunities;

2. Impacts on Other Users. The commercial facility and the use it generates will avoid significant negative impacts on the amount and quality of existing uses including fish and wildlife harvest. It is recognized that a quantitative determination of the effects of the proposed facility will rarely, if ever, be possible, but an assessment of impacts should use information as available from DNR, ADF&G, the upland owner, or other available sources to determine the following:

a. The number of commercial recreation leases, permits, and facilities that already exist on state and, if available, on other land in that unit and the amount of use they generate.

b. Management intent and guidelines of this or subsequent plans for the unit.

c. Management objectives for nearby non-state lands (to the extent this information is available).

d. For facilities supporting recreational fish and wildlife harvest, ADF&G should be consulted concerning the effect of increased harvest on the fish and wildlife resource, and on established commercial, recreation, and subsistence users.

e. Other information and analysis as available including that documenting the existing amount and quality of public use including the harvest of fish and wildlife resources.

3. Siting, Design, Construction, and Operation. The facility will be sited, designed, constructed, and operated in a manner that creates the least conflict with natural values

and traditional uses of the area. To the extent practical, floatlodes should be visually and acoustically hidden from main travel routes, frequently used anchorages, regionally important campsites, and frequently used recreation areas (see also guideline D, *Scenic Resources*, page 2-31). In addition, floatlodes should not be sited more than one per bay except where it is the land manager's intent to concentrate uses in order to minimize conflicts with existing use.

Final authorization for the facility will be given only after consultation with ADF&G and DPOR.

4. Upland Access to Floatlodes. Where the need for upland access to the floatlodes is anticipated, the floatlodes will be located where there is legal upland access to the site.

5. Permitting and Leasing Requirements.

a. Application Deadline and Batch Processing. Public notice, coordination with upland owners and agencies, gathering information, DNR's adjudication of applications, and DNR's analysis of conflicts and cumulative impacts are all more efficient if each year's floatlodge applications are processed at one time. To allow for this coordinated processing, DNR, Division of Land and Water Management, will schedule at least one 60-day period each year during which floatlodge applications will be accepted. The application period will precede the summer operating season by six months or more. To obtain more information about annual application periods, the applicant should contact the Division of Land and Water Management (public information office at the Frontier Building; 3601 C Street; Box 107005; Anchorage, Alaska 99510; (907) 561-2020). This application requirement may be waived by the land manager if, in individual circumstances, he finds that it is possible to gather infor-

mation and coordinate processing by other means.

b. Type of Authorization. Commercial recreation facilities will generally be authorized by leases, though the land manager may use a permit if he determines that a permit would meet the intent of these guidelines.

c. Authorization term. In order to retain land management flexibility for the state and upland land owner, authorizations should be for five years or less. A longer term may be approved if the land manager determines that a longer term will not harm the public interest and is required for the business or financing requirements of the applicant.

d. Site Control. To minimize costs, a tidelands survey will not be required unless exact site control is critical to the protection of adjacent resources or nearby property owners, or is required by statute.

e. Fair Market Value. To ensure return to the state and to avoid unfair competition with nearby private land, commercial lodge authorizations will require payment of fair market value as determined through appraisal, auction, or other appropriate means.

6. Development Plan. A development plan will be required. The plan will include location; seasons of operation and type of service to be provided (including areas where clients will be guided, if applicable); description of the facilities; the method of fuel storage, waste disposal, and water source; and projected use of the adjacent uplands, or other subjects as appropriate. (If use is shown for the adjacent non-state uplands, agreement will be required from the upland owner, see guideline B, *Permission of Upland Owner*, page 2-2.)

7. **Violation of permit/lease terms.** Conviction for trespass related to the authorized activity, or violation of the terms of the authorization including significant unapproved departure from the development plan may be grounds for termination of the lease or permit.

8. **Other Guidelines for Floating Commercial Recreation Facilities.** Floating commercial recreation facilities must also meet guidelines C through H in the Floating Residential and Commercial Facilities section on pages 2-11 and 2-12.

D. Scenic Resources. Facilities on state uplands and tidelands should be located and designed to blend in with the natural surroundings. Permit or lease stipulations to accomplish this guideline may address location, size, color, materials, requirements for vegetative or topographic screening, or other measures as appropriate.

E. Permits and Leases Adjacent to Recreation Facilities. Tideland activities may be allowed adjacent to public recreation facilities, including public use cabins, lodges, or fuel stops, if the land manager determines that the two uses can be made compatible by design, siting, or operating guidelines; or if the land manager determines there is no feasible and prudent alternative for the activity. This guideline applies to both existing facilities and to sites reserved for future recreation facilities. The land manager's determination will be made after consultation with the facility manager.

F. Sport Diving Sites. Managers should avoid authorizing activities within commonly-used-sport-diving sites unless the activity is consistent with the use of those sites. Activities should avoid decreasing the quality or safety of the dive sites. In these areas public notice given under AS 38.05.495 or its

equivalent should include the Alaska Sport Divers Association.

G. Anchorages and Campsites. See guideline D, *Anchorages, Regionally Important Campsites, and Frequently Used Recreation Areas*, page 2-25.

H. Cultural Resources. Recreation facilities should not be placed adjacent to cultural resource sites which might subject the sites to vandalism because of the increased public use.

I. Cultural Resources Identification. Identify and determine the significance of all cultural resources on state land through the following actions:

1. Cultural resources surveys conducted by the Department of Natural Resources personnel.
2. Encouraging research about cultural resources or state land by qualified individuals and organizations.
3. Cooperative efforts for planned surveys and inventories between state, federal, and local or Native groups.

J. Cultural Resources Protection. Protect significant cultural resources through the following actions:

1. Reviewing construction projects or land uses for potential conflict with cultural resources.
2. Cooperating with concerned government agencies, Native corporations, statewide or local groups, and individuals to develop guidelines and recommendations on how to avoid or mitigate identified or potential conflict.

K. Other Guidelines that Affect Recreation. A number of other guidelines may affect recreation management practices. For details of these guidelines, see the following sections of this chapter:

- Coordination and public notice
- Fish and wildlife habitat and harvest areas
- Forestry
- Materials
- Public and Private Access
- Settlement
- Shoreline development
- Subsurface resources

Summary of Policies

Prince William Sound is an international tourist attraction. While much of the use is concentrated at locations such as the Columbia Glacier and along cruise ship and ferry routes, dispersed recreation occurs throughout the Sound. State land will be used to support and encourage recreation and tourist use by protecting recreation resources and providing land for recreation facilities.

Coordination with Other Landowners. State recreation management, including the location and management of recreation facilities, will be coordinated with other landowners to avoid unnecessarily duplicating USFS or private facilities and to provide areas where facilities do not exist.

Resource Protection. State tidelands adjacent to proposed USFS wilderness will be managed for their recreation, fish and wildlife habitat and harvest, and wilderness values. These areas include College Fiord, Blackstone Bay, Cochrane Bay, Culross Passage, Port Nellie Juan, Icy Bay, and Port Bainbridge. Recreation is a primary use in other areas including commonly used fishing and wildlife harvest sites and frequently used recreation areas. Except for settlement areas, recreation is a primary use for most coastal state uplands in the planning area. The plan contains guidelines to protect the capacity and

natural appearance of most anchorages and regionally important campsites, to provide design and siting criteria for recreation facilities, and to protect cultural resources.

Commercial Recreation Facilities. The state intends that the full spectrum of recreation opportunities be available from a combination of state, federal, and private land. Recreation facilities should be concentrated along commonly used recreation routes. This concentration will facilitate recreation use while allowing most of the Sound to retain its current natural qualities.

The three paragraphs below and **Map 2-1** indicate where commercial recreation facilities may be allowed and where they are prohibited. Where allowed, commercial recreation facilities must meet the guidelines and intent of the plan. These guidelines address location of facilities, coordination with the upland owner, impact on other users including recreation, and fish and wildlife harvest. In order to coordinate public notice and information gathering, the plan directs the land manager to establish an annual deadline for floatlodge applications.

The Whittier to Valdez Marine Route. Commercial recreation facilities including lodges, fuel stops, or campgrounds will be sited in Esther Bay and from a combination of state and private lands near the Columbia Glacier. Commercial recreation facilities will not be sited on other state lands near this route including the Perry Island, Naked Island, or Eaglek Bay management units. After the Esther Island site is developed and after development occurs in Passage Canal, the state may determine that additional commercial facilities are needed. At that time, facilities may be authorized within Port Wells if they would enhance recreation use and if expansion of facilities at Esther Island or in Passage Canal would be more difficult or would not result in the same benefits.

The Whittier to Seward Marine Route. Private uplands along this route are expected to provide commercial recreation opportunities

including lodges and fuel stops. To ensure that an adequate amount of undeveloped land exists for public use, commercial recreation facilities will not be authorized on state tidelands adjacent to public uplands within the Knight Island management unit. This policy may be reevaluated after 1992 if adequate facilities are not developed on private uplands, or if increased competition would benefit the public. Additional facilities would be allowed only if the department finds that they would benefit public recreation.

Other Areas. In other areas of the Sound, commercial facilities may be allowed on state lands and tidelands where they would not displace significant public use, and would not exceed the area's capacity including anchorages, campsites, other recreation uses, and fish and wildlife harvest. Facilities must also be consistent with the management intent and guidelines of the plan. In addition, all facilities will be coordinated with the needs and development of nearby USFS and private land. Finally, floatlodges and similar facilities are prohibited from state lands adjacent to USFS proposed wilderness areas, and on most of Hinchinbrook Island because such facilities would be incompatible with existing public use and federal management for these lands.

Public Notice for Commercial Recreation Facilities. Public notice of a proposed permit or lease for commercial recreation facilities will be sent to adjacent upland owners, user groups, and communities that may be affected by the activity. (This notice provision is in addition to the department's existing public notice procedures.)

Public Recreation Facilities. Public recreation facilities include facilities such as public use cabins, cleared tent sites, mooring buoys, and other low-impact facilities for the general public. These facilities are appropriate to prevent damage to the environment, accommodate conflicting uses (for example, within settlement areas), and expand the anchorage or campsite capacity, or encourage additional public use. Areas appropriate for these facilities include state uplands within Passage Canal, Surprise Cove, Siwash Bay, Shoup Bay, Boswell Bay, Canoe Passage, near commercial recreation facilities, and near or within state settlement areas. Public recreation facilities may be sited in other locations where consistent with the management intent and guidelines of the plan.

Proposed Legislative Designations. Nine locations are recommended for consideration by the legislature for designation as state

Table 2-2. Potential Areas for Legislative Designation as State Marine Parks.

<u>Marine Park</u>	<u>Management Unit</u>	<u>Upland Acreage</u>
Entry Cove	Passage Canal (subunit 2D)	370
Decision Point	Passage Canal (subunit 2E)	460
Granite Bay	Port Wells (subunit 5G)	2,015
Driftwood Bay	Day Harbor (subunit 15A)	840
Safety Cove	Day Harbor (subunit 15A)	660
Boswell Bay Beaches	Hinchinbrook Island (subunit 25A)	799
Canoe Passage	Hawkins Island (subunit 26A)	1,455
Jack Bay North	Valdez Arm (subunit 22F)	811
Kayak Island	Katalla (subunit 29A)	1,437
		<hr/>
		TOTAL: 8,937

marine parks to ensure their long-term public retention for recreation. These areas have outstanding scenic and recreation values, and generally receive a high level of public use. In some cases, active recreation management is also required. The areas are shown on Map 2-1, and their management intents are described in Chapter 3.

The plan also recommends legislative consideration of the Thompson Pass - Keystone Canyon area because of the area's spectacular alpine scenery and frequent recreation use. This recommendation was also made in the Copper River Basin Area Plan.

The area surrounding Lake George should be considered for addition to Chugach State Park because of its unique scenic, geologic, and glacial features. This addition was recommended by the 1981 Chugach State Park Master Plan. Finally, the Mount Eccles - Heney Creek area near Cordova should be

considered for legislative designation to support the recreation and tourism needs of the City of Cordova. The exact type of legislative designation, whether park or other category, will be determined in coordination with the City. Legislative designations are also described in Chapter 4.

Cultural Resources. The plan does not depict cultural and historic sites on maps or in the text to avoid pinpointing their location for potential vandalism. However, all DNR authorizations are reviewed by the Office of History and Archaeology (within DNR). The Office determines if there may be an adverse effect on cultural resources and makes recommendations to mitigate those effects. Guidelines in the plan also give direction for cultural resource surveys; review of authorizations; and cooperation with other agencies, Native Corporations, nonprofit groups, and individuals.

United States Department of Agriculture
Forest Service
Alaska Region

Decision Notice
and
Finding of No Significant Impact
for
Issuing Special Use Permits to
Sea Kayak Outfitter Guides in
Nellie-Juan, College Fjord Wilderness Study Area

Glacier Ranger District
Chugach National Forest

November, 1993

I. Introduction

The purpose of this Decision Notice is to document the factors I considered and the rationale I used for making a decision concerning the issuance of Special Use Permits (SUP) to sea kayak outfitter/guides in Nellie-Juan, College Fjord Wilderness Study Area (WSA). The proposed action is to issue Special Use Permits to outfitter/guides for conducting sea kayak trips in the WSA, western Prince William Sound, Glacier Ranger District, Chugach National Forest. This Decision Notice documents the rationale I used in arriving at my decision and how it is consistent with and implements the goals and objectives of the Chugach Land and Resource Management Plan. The environmental assessment (EA) is available for review at the Forest Supervisor's office in Anchorage and Glacier District Ranger's office in Girdwood.

II. Decision and Reasons for the Decision

A. Decision

Based on the information analyzed and disclosed in the environmental analysis (EA), I select Alternative 2 which allows for issuance Special Use Permits to the outfitter/guides for conducting sea kayak trips. Two alternatives were analyzed in detail and considered. Two additional alternatives are considered, but not in detail. I believe the range of alternatives addresses existing laws, regulations, the Chugach Forest Plan direction and responds to public comments.

B. Applicable Laws, Regulations and Policy

Chugach Forest Plan

This action is consistent with the Chugach Land and Resource Management Plan of 1984 (Forest Plan). The EA discusses the relation of the proposed action to the direction provided by the Forest Plan.

Alaska Regional Guide (U.S.D.A. Forest Service, Regional Guide for the Alaska Region)

The purpose of the Alaska Regional Guide is to provide national and Regional direction to the Forests within the Alaska Region for land and resource planning efforts.

C. Issues

The following issues were formulated by the Interdisciplinary Team through analysis of public comments, experience from past projects, past planning efforts, internal scoping and management direction in the Forest Plan.

1. Archeological/Historical Sites: **What are the potential impacts to archeological/historical sites by guided sea kayaking camping activities?**
2. Wilderness Characteristics: **How would the wilderness characteristics of the Nellie Juan College Fjord Wilderness Study Area (WSA) be affected by the proposed action?**
3. Wildlife Habitat/Eagle Nests: **What are the potential impacts to wildlife habitat, in particular bald eagle nest sites?**

The issues were used in formulation of the alternatives, analysis of the environmental consequences, and defining the range of alternatives. In making my decision I considered Issues 1 through 3 by reviewing the Environmental Consequences section of the analysis.

D. Factors Considered in Making the Decision

In making the decision to issue SUP's to sea kayak outfitter/guides, I considered the following (see EA):

1. Decisions and direction established in the Chugach National Forest Land and Resource Management Plan. Specific Forest Plan desired future condition goals pertaining to the proposed action are (Forest Plan, III-3):

"Contribute a proportionate share of the Southcentral Alaska supply of recreation opportunities, wilderness, wildlife and fish habitat, minerals and timber."

"Where possible, contribute to the local economy and provide for community stability."

"Provide for the production of various Forest goods and services while minimizing adverse social, economic and environmental effects."

The Forest Plan also provides guidelines for management of wilderness (USDA Forest Service. 1984a,pIII-4):

"Until the Congress acts on the wilderness recommendation, the areas recommended and the Nellie Juan-College Fjord Wilderness Study Area will be managed to maintain their presently existing character. Wilderness designated by Congress will be managed as directed by the 1964 Wilderness Act and the 1980 Alaska National Interest Lands Conservation Act (Alaska Lands Act)."

The selected Forest Plan alternative provides for a mix of forest goods and services contributing to the local economy and community stability, while minimizing adverse social, economic and environmental effects (FEIS-ROD, p.4), Forest Plan Settlement Agreement (FEIS-ROD, p.6).

2. The Alaska Regional Guide.
3. The public comments received.

E. Rationale for the Decision

I am selecting Alternative 2 for the following reasons (see EA):

It moves towards implementation of the management goals established in the Chugach Forest Plan. The proposed sea kayak outfitter/guide SUP area is located within the Depositional Valleys (Analysis Area 12), Nellie Juan, Prince William Sound, Management Area 5 (USDA Forest Service. 1984a.,pIII-85). The following are the specific goals which apply to Management Area 5, Analysis Area 12, and how I feel the direction is being implemented by selection of Alternative 2:

Primary Management Goals:

- **Enhance marine oriented recreation opportunities**

Providing outfitted/guided sea kayaking trips in the Nellie-Juan, College Fjord WSA enhances marine oriented recreation opportunities. By providing several options, the visitor can choose the best trip that meets their needs.

- **Maintain landscape character**

In Alternative 2, sea kayak guides would be issued Special Use Permits. Sea kayaking has very little impact on the landscape character. The National Outdoor Leadership School has operated in the WSA for the past 23 years and the landscape character has not changed as a result of their use. The landscape character is not expected to change under this alternative.

- **Recommend wilderness designation**

Alternative 2 would not hinder wilderness designation recommendation. Permit stipulations will require that outfitter/guides teach their clients "Leave No Trace" camping techniques.

- **Maintain existing wilderness character in areas recommended for wilderness**

Implementation of Alternative 2 would maintain existing wilderness character in the Nellie Juan-College Fjord WSA which is recommended for wilderness.

- **Maintain wildlife habitat and improve fish habitat**

Implementation of Alternative 2 would have no effect on either the maintenance of wildlife habitat or the improvement of fish habitat.

III. Alternatives Considered

In making my decision I considered the following alternatives:

Alternative 1 - No Action

If this alternative were implemented, no new or renewal Special Use Permits for outfitter/guide activities would be issued for the WSA.

Alternative 2 - Issue Special Use Permits to Sea Kayak Outfitter/Guides.

Special Use Permits would be issued to Sea Kayak Outfitter/Guides.

Alternatives Considered but Eliminated from Detailed Analysis.

I also reviewed the two alternatives that were considered and eliminated from detailed analysis. Both alternatives wholly or partially meet the purpose and need and address the issues. They were all eliminated during the analysis process by the ID Team. I reviewed the rationale for elimination in Section II of the EA and agree with the conclusions to eliminate them from further analysis.

IV. Public Involvement

On March 8, 1993, a scoping letter was mailed to 150 individuals, including several organizations and Government agencies. A legal notice was also placed in the Anchorage Daily News asking for comments. Forty-two response letters were received from this scoping letter.

On April 2, 1993, a second scoping letter was mailed, updating respondents to the first scoping letter. This letter summarized the issues and presented a set of proposed alternatives.

On April 16, 1993, the Glacier Ranger District staff met with Cliff Eames of the Alaska Center for the Environment, Pam Brodie of the Wilderness Society, and Jim Young of the Sierra Club to discuss issues each group had regarding the proposed action, along with other upcoming District projects.

The April, 1993 issue of "Chugach National Forest Schedule of Proposed Actions for Environmental Analysis" listed this project and requested public input.

Written comments in response to the scoping letters were received from members of the general public, private interest groups and State and Federal agencies. These letters are in the Project Record, located at the Glacier Ranger Station in Girdwood, Alaska.

V. Finding of No Significant Impact

I have determined through the Environmental Analysis that this is not a major Federal action that would require the preparation of an environmental impact statement. The determination of finding of no significant impact is based on the following factors:

There are no significant cumulative effects that would result from this action.

The physical and biological effects would be limited to the area of planned activity.

No known threatened or endangered species of wildlife or plants would be affected.

The action would not adversely affect cultural resources, or objects listed, or eligible for listing, in the National Register of Historic Places.

There is no significant possibility of significant restriction to subsistence resources or their use as a result of this action.

This action is consistent with the Chugach Forest Plan as amended.

This action has been determined to not have a direct impact to the coastal zone and is consistent to the maximum extent practicable with the Coastal Zone Management Act.

The project is within the guidelines established by the Alaska National Lands Interest Conservation Act.

This action will have limited context and intensity [40 CFR 1508.27], individually or cumulatively, to the social or economic rights, minority groups and women; prime farmland, rangeland, and forestland; wetlands and floodplains; significant scientific or sensitive species (or their habitat). This project does not pose a violation of Federal, State, or local law or requirements imposed for the protection of the environment. Therefore, I find that an environmental impact statement is unnecessary.

VI. Implementation

Implementation may occur no sooner than seven (7) days from the date this decision appears in the Anchorage Daily News.

VII. Administrative Review

This decision is subject to administrative review pursuant to 36 CFR 217. Any appeal of this decision must be fully consistent with 36 CFR 217.9. The appeal must be filed in writing within 45 days of the date the legal notification is published in the Anchorage Daily News. The Notice of Appeal must be filed in duplicate with:

Forest Supervisor
Chugach National Forest
3301 "C" Street, Suite 300
Anchorage, AK 99503-3998

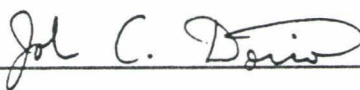
A copy of the appeal should simultaneously be sent to John C. Dorio, District Ranger.

An appeal will not halt implementation of this decision. A stay, if granted, stops initial implementation of the decision while the appeal is considered on its merits. A request for stay must be filed with the reviewing officer.

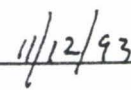
VIII. Contact Person

For additional information concerning this decision or the Forest Service appeal process contact John Dorio, Glacier District Ranger, Glacier Ranger District, P.O. Box 129, Girdwood, AK 99587 (907) 783-3242.

IX. Signature



JOHN C. DORIO
District Ranger



Date

United States Department of Agriculture
Forest Service
Alaska Region

Environmental Assessment
for
Issuing Special Use Permits
To Sea Kayak Outfitter Guides
In Nellie-Juan, College Fjord Wilderness Study Area

Glacier Ranger District
Chugach National Forest

November, 1993

I. Introduction

Proposed Action

The U.S.D.A. Forest Service (Forest Service) has received several applications for conducting outfitted/guided sea kayak trips in the Nellie-Juan, College Fjord Wilderness Study Area (WSA) located in western Prince William Sound, Chugach National Forest. Applicants include: Wilderness: Alaska/Mexico; Sea Quest Expeditions; Intec, Inc., dba Adventures and Delights; and Blue Water Paddling. Currently, National Outdoor Leadership School (NOLS) and Wilderness Ventures have Special Use Permits for providing outfitted/guided sea kayak trips in the WSA.

Purpose and Need

There is increasing public demand for outfitted/guided sea kayak trips in the WSA. Any new guide must secure a Special Use Permit for the purpose of conducting sea kayak trips on National Forest system lands in western Prince William Sound.

Background Information

The September 18, 1992 issue of the Federal Register lists changes to the National Environmental Policy Act (NEPA) regarding USDA Forest Service project implementation. The new regulations have affected the renewal and issuance of Special Use Permits in the Nellie Juan-College Fjord Wilderness Study Area (WSA) as follows:

A proposed action may be categorically excluded from documentation in an environmental impact statement (EIS) or environmental assessment (EA) only if the proposed action . . . is within a category listed in Sec. 31.1b or 31.2; and there are no extraordinary circumstances related to the proposed action. Extraordinary circumstances include, but are not limited to, the presence of the following . . . Congressionally designated areas, such as wilderness, wilderness study areas, or National Recreation Areas.

Management Direction

Chugach Forest Plan

The Alaska Regional Guide (USDA Forest Service, Regional Guide for the Alaska Region) and the Chugach Land and Resource Management Plan of 1984 (Forest Plan), as amended, established the overall framework for management of the Forest. It sets general and specific goals for management and establishes standards and guidelines to follow in pursuit of those goals. The Forest Plan provides for multiple use management of the recreation, wilderness, wildlife and fish, timber, and minerals resources throughout the Forest (USDA Forest Service. 1984a.,p.3). Specific Forest Plan goals with respect to the desired future condition pertaining to the proposed action are (USDA Forest Service. 1984a, pIII-3):

"Contribute a proportionate share of the Southcentral Alaska supply of recreation opportunities, wilderness, wildlife and fish habitat, minerals and timber."

"Where possible, contribute to the local economy and provide for community stability."

"Provide for the production of various Forest goods and services while minimizing adverse social, economic and environmental effects."

The Forest Plan also provides guidelines for management of wilderness (USDA Forest Service. 1984a, pIII-4):

"Until the Congress acts on the wilderness recommendation, the areas recommended and the Nellie Juan-College Fjord Wilderness Study Area will be managed to maintain their presently existing character. Wilderness designated by Congress will be managed as directed by the 1964 Wilderness Act and the 1980 Alaska National Interest Lands Conservation Act (Alaska Lands Act)."

The Forest Plan also established monitoring requirements to help determine how well the standards and guidelines are working and whether the goals remain appropriate throughout the planning period (USDA Forest Service. 1984a., Sec.IV,B.).

Analysis Area Goals and Management Prescriptions

The all sea kayak trips are proposed for sites within the Depositional Valleys (Analysis Area 12), Nellie Juan, Prince William Sound, Management Area 5 (USDA Forest Service. 1984a., p.III-85). The following specific management direction applies to Management Area 5, Analysis Area 3:

Primary Management Goals:

- Enhance marine oriented recreation opportunities

- Maintain landscape character

- Recommend wilderness designation

- Maintain existing wilderness character in areas recommended for wilderness

- Maintain wildlife habitat

- Improve fish habitat

Decision to Be Made

The decision to be made is whether or not to issue the prospective outfitter/guides Special Use Permits for conducting outfitted/guided sea kayak trips in western Prince William Sound. The decision made from this analysis will be made by the District Ranger.

Scoping

On March 8, 1993, a scoping letter was mailed to 150 individuals, including several organizations and Government agencies. A legal notice was also placed in the Anchorage Daily News asking for comments. Forty-two response letters were received from this scoping letter.

On April 2, 1993, a second scoping letter was mailed, updating respondents to the first scoping letter. This letter summarized the issues and presented a set of proposed alternatives.

On April 16, 1993, the Glacier Ranger District staff met with Cliff Eames of the Alaska Center for the Environment, Pam Brodie of the Wilderness Society, and Jim Young of the Sierra Club to discuss issues each group had regarding the proposed action, along with other upcoming District projects.

The April, 1993 issue of "Chugach National Forest Schedule of Proposed Actions for Environmental Analysis" listed this project and requested public input.

Written comments in response to the scoping letters were received from members of the general public, private interest groups and State and Federal agencies. These letters are in the Project Record, located at the Glacier Ranger Station in Girdwood, Alaska.

Issues

The following issues were formulated by the Interdisciplinary Team through analysis of public comments, experience from past projects, past planning efforts, internal scoping and management direction in the Forest Plan.

1. What are the potential impacts to **archaeological/historical** sites by guided sea kayaking camping activities?
2. How would the wilderness characteristics of the Nellie Juan-College Fjord Wilderness Study Area (WSA) be affected by the proposed action?
3. What are the potential impacts to **wildlife habitat**, in particular bald eagle nest sites?

II. Alternatives

Alternatives were developed to fulfill the purpose and need, address all significant issues, and provide a contrast of options and environmental effects.

Alternative 1 - No Action

Under this alternative, no new or renewal Special Use Permits (SUP's) for outfitter/guide activities would be issued for the Nellie Juan-College Fjord Wilderness Study Area (WSA). New/renewal SUP's would not be issued until the Forest Plan Revision is completed (Forest Plan Revision is scheduled to begin in 1994) and provides more direction for issuing SUP's in the WSA.

Alternative 2 - Issue Special Use Permits to Sea Kayak Outfitter/Guides

Special Use Permits would be issued to Sea Kayak Outfitter/Guides. A one-year permit would be issued for the first three years of a guide's operations. If the guide was successful and provided a needed service, a 5-year permit could be issued.

Additional Alternatives Considered but Eliminated from Detailed Study:

1. Determine carrying capacity using Recreation Opportunity Spectrum (ROS) Inventory.

This alternative was considered but eliminated from detailed study because there is insufficient time and resources to calculate carrying capacity. Currently, two sea kayak outfitter/guides are offering trips in the WSA. Those permitted guides are the National Outdoor Leadership School and Wilderness Ventures. Capacity for issuing permits to outfitter/guides in the WSA has not been reached. The process for conducting a carrying capacity study in the WSA is beginning now and will not be completed until the Chugach Forest Plan Revision process which begins in 1995.

2. Perform a Limits of Acceptable Change (LAC) Analysis

A Limits of Acceptable Change analysis began in 1992. Currently there is not enough data to determine outfitter/guide use levels. LAC analysis will continue through the stages of analysis over the next several years. The results of the LAC analysis would be proposed for inclusion in the Chugach Forest Plan Revision.

III. Environmental Consequences

This section describes the potential environmental consequences of implementing the Alternatives. The environmental consequences are described according to the issues stated in Section I.

Issue #1 - What are the potential impacts to archaeological/historical sites by guided sea kayaking camping activities?

In Alternative 1 (No Action) no permits would be issued in the Nellie Juan-College Fjord WSA. There would be no potential impacts to archeological/historical sites from outfitter/guides.

Alternative 2 (Issue Special Use Permits to sea kayak outfitter-guides) could cause potential impacts to archeological/historical sites if any of the outfitter-guides camped at any of those sites.

In order to alleviate potential impacts to archeological/historical sites, special use permits issued to outfitter-guides would exclude use of camping areas at or near archaeological/historical sites.

Issue #2 - How would the wilderness characteristics of the Nellie Juan-College Fjord Wilderness Study Area (WSA) be affected by the proposed action?

Preserving wilderness character is achieved by preventing impacts to archaeological/historical sites, wildlife habitat and vegetation. The social aspect of wilderness character has two components: 1)Minimum contact with other groups and 2)small group size.

Alternative 1 (No Action) would preserve wilderness characteristics in the Nellie Juan-College Fjord WSA because no permits would be issued to outfitter/guides until analysis is complete through Forest Plan Revision. Only private users would be allowed to camp in the WSA. There would be no impacts to archaeological/historical sites, wildlife habitat and vegetation, except from private users. People using the WSA would have minimal contact with groups or other people.

Alternative 2 would have minimal effects on the wilderness characteristics in the Nellie Juan-College Fjord WSA. Sea kayaking outfitter/guides would be encouraged to camp at rocky beach sites and to teach "minimum impact camping" techniques to their clients.

Cumulative Effects: Cumulative effects would occur through constant use of the same campsites. Compaction of soil and over-utilization of trees for firewood would occur. A mitigating measure would be to require that outfitter/guides use designated camping beaches to concentrate use. Further mitigation would be to require that "Leave No Trace" camping techniques be taught to all clients.

***Issue #3* - What are the potential impacts to wildlife habitat, in particular bald eagle nest sites?**

Alternative 1 (No Action) would have no potential impacts to wildlife habitat and bald eagle nest sites. Private campers and day users could have potential impacts to wildlife habitat and bald eagle nest sites if they camped closer than 660' (US Fish & Wildlife Service, 1993) to an active bald eagle nest site.

Alternative 2 may have potential effects on wildlife habitat, in particular bald eagle nest sites, if guided campers camp near active bald eagle nest sites. If camping sites were designated, eagle nests could be avoided. Such impacts could be controlled by stipulations on the Special Use Permit (SUP) limiting camping to sites at least 660' away from active eagle nest sites.

SUBSISTENCE EVALUATION

Section 810 of the Alaska National Interest Lands Conservation Act (ANILCA) requires a Federal agency, having jurisdiction over lands in Alaska, to evaluate the potential effects of proposed land-use activities on subsistence uses and needs.

The effect of the proposed action of sea kayak outfitter/guides on subsistence use and needs were evaluated and found that 1) access to traditional subsistence-use areas within western Prince William Sound and WSA would not be affected; 2) there would be no change in competition between rural and non-rural uses; 3) there would be no change in the abundance and distribution of available subsistence resources.

The analysis concludes that the actions proposed in Alternatives 1 and 2 do not present a significant possibility of a significant restriction to subsistence uses in western Prince William Sound.

COASTAL ZONE MANAGEMENT ACT of 1976 (CZMA)

The Alaska Coastal Management Program (ACMP) developed under CZMA contains the standards and criteria for a determination of consistency for activities within the coastal zone. Although Federal lands are excluded from the coastal zone, the Coastal Zone Management Act of 1976 requires Federal agencies conducting activities or developments are consistent with approved State management programs to the maximum extent practicable. The alternatives have been evaluated by the Forest Service against applicable provisions of the ACMP and found to be consistent to the maximum extent practicable.

IV. List of Preparers and Persons Consulted

List of Preparers

The following individuals participated in the formulation and analysis of alternatives, the review and the subsequent preparation of the Environmental Assessment for Issuing a Special Use Permit to sea kayak outfitter/guides.

Elaine Gross - IDT Leader, Recreation Specialist, Glacier Ranger District
Shannon Skibenness - IDT Member, Coop Student, Glacier Ranger District
Alison Rein - IDT Member, Staff Officer, Glacier Ranger District
Victor Baer - IDT Member, Recreation Forester, Glacier Ranger District

The following Forest Service people assisted in the preparation of the environmental analysis:

Cliff Fox, NEPA Coordinator, Glacier Ranger District
Charla Sterne - Wildlife Biologist, Glacier Ranger District
John Mattson - Archeologist, Chugach National Forest
Steve Hennig - Recreation Planner, Chugach National Forest
Leo Keeler - Lands Specialist, Chugach National Forest

List of Agencies and Persons Consulted

Sally Gibert, State CSU Coordinator, DGC, State of AK
Roy Nowlin, Wildlife Biologist, ADF&G
Lance L. Trasky, Regional Supervisor, ADF&G
Wyn Menefee, Park Ranger, Alaska Department of Natural Resources
Jack Sinclair, Park Ranger, Alaska Department of Natural Resources
David Stephens, Chief, Policy and Planning, AK DNR
Barbara A. Mahoney, National Marine Fisheries Service
Mary Mueller, Lands Specialist, USDA Forest Service
Michael R. North, Ecological Services, U.S.D.I. Fish and Wildlife Service
Steve Oakes, Concessions Assistant, National Park Service
Pat Quinn, Concessions Analyst, National Park Service

References

U.S. Alaska National Interest Lands Conservation Act (ANILCA) of 1980.

U.S. Federal Register. Notice of adoption of final policy. September 18, 1992.

U.S. Wilderness Act of 1964.

U.S.D.A. Forest Service:

Chugach National Forest Land and Resource Management Plan. July 1984.

Chugach National Forest. "Decision Notice and Environmental Assessment on Implementation of Agreement to Settle the Appeal of the Chugach National Forest Land and Resource Management Plan". January 7, 1986.

Forest Service Handbook, Region 10 (Alaska) Supplement, 2300-92-1 on Wilderness Management. Effective Date, 2/14/92.

Forest Service Handbook, Region 10 (Alaska) Supplement, 2709.11-92-2 on Outfitter Guides. Effective Date, July 1, 1992.

U.S.D.I. Fish and Wildlife Service. Draft "Bald Eagle Basics - Alaska". 1993.

APPENDIX G

Sea Kayak Outfitter/Guide Meeting Notes April 18, 1994

This meeting was specifically for outfitter/guides who offer sea kayak trips in the Nellie Juan, College Fjord Wilderness Study Area (WSA), Glacier Ranger District. The following people attended the meeting:

Brad von Wichman - Alexandra, Inc.
Macgill Adams - Wilderness Alaska
Eleanor Huffines - National Outdoor Leadership School (NOLS)
Don Ford - National Outdoor Leadership School (NOLS)
Kimmer Ball - Adventures & Delights
Paul Twardock - Alaska Pacific University
John Mattson - Chugach Forest Archeologist
Nancy Gehm - Seward Ranger District & Leave No Trace Master
Elaine Gross - Glacier Ranger District - Meeting Facilitator & Permit Administrator

An effort was made to contact affected outfitter/guides about the meeting. Next spring we are planning to host a larger, 1-day meeting for all outfitter/guides who operate on the Glacier Ranger District.

Meeting Purpose:

In order to protect archeological sites located in the Nellie Juan, College Fjord Wilderness Study Area (WSA) while providing camping areas for outfitted/guided groups, the idea of designating campsites for outfitter/guide use was analyzed in a Clemson University project paper written by Elaine Gross. (The project paper will be available after June 20, 1994. Contact Elaine at 783-3242 if you are interested in a copy of the paper). It was found that approximately 30 archeological sites can be and/or have been impacted by camping sites located too close to them.

The Chugach National Forest Land and Resource Management Plan recommends that the WSA be managed as wilderness and managed to maintain the wilderness character of the area. The U.S.D.A. Forest Service has the legal mandate to preserve cultural/historical resources. As more outfitter/guides and private users utilize the WSA, cultural/historical resources are being impacted. In order to better preserve cultural/historical resources, outfitter/guides are being asked to camp at designated sites. In the past, outfitter/guides were told specifically where not to camp (listed on the face of the special use permit). Now, outfitter/guides will receive a copy of a map listing camping sites.

The designated camping site map was formulated using the following information:

Paul Twardock (past NOLS instructor) identified approximately 150 sites on quad maps that were given to the Glacier Ranger District in 1993.

All sites identified by Mr. Twardock were input into the Chugach National Forest's Geographic Information System (GIS).

292 archeological sites within the WSA are shown on a GIS layer (highly confidential information).

GIS camping site mylar was overlayed on the GIS archeological site map. Any camping sites that were located too closely to archeological sites were removed from the GIS map.

Approximately 130 camping sites are currently listed on the map given to outfitter/guides.

Archeological Site Protection:

Chugach National Forest Archeologist John Mattson spoke about archeological site protection. Chugach Alaska Corporation Archeologist John Johnson was unable to attend.

The National Historic Preservation Act requires impact analysis and permitting. This is an area of concern -- outfitter/guides can help sensitize clients to artifacts and then report back to the Forest Service. Currently, knowledge of archeological sites is restricted.

State of Alaska manages the land below mean-high tide. State policy is to "leave as found". All historical/archeological resources found in this zone are managed by the State.

If artifacts are found, at a minimum, sketch or photograph them, and pass information on to the District Ranger (Glacier Ranger District phone number is 783-3242). There is a concern for small, portable artifacts made of greywackie or greenstone (such as grinding stones, tools of bone or teeth, pecking stones and blades).

The Forest Service policy is to "leave them in place" and report with photos and maps.

There is on-going erosion of archeological sites: since the 1964 earthquake, some formerly uplifted sites have dropped and are being eroded by the ocean. Burial caves, rock structures and occupation camps are located on uplands. Several accessible sites have already been vandalized. Some sites are exposed to waves and more artifacts are washed out yearly.

Sites near fish streams have a higher likelihood of having caves and artifacts in the area. There are some pictographs in the WSA - many are eroding away. Human remains have the greatest level of protection from the Native Corporations and the Federal Government, and carry the highest level of prosecution if remains are disturbed.

The following is prohibited: No person may

- Excavate
- Alter/deface
- Remove
- Damage

Unless permitted.

Whenever mineral soil is disturbed, artifacts/sites may be disturbed. If less than 1 square meter is disturbed, this is permitted by the Forest Service. Stop disturbing mineral soil if artifacts are found. Report **immediately** to the District Ranger (783-3242). Particularly important not to disturb is bone.